

# TSD File Inventory Index

Date: October 5, 2009

Initial: CMH/MSD

Facility Name: <u>Deligo Sealing Products, Inc. (Ex. Folder Site)</u>			
Facility Identification Number: <u>IPD 066197195</u>			
<b>A.1 General Correspondence</b>		<b>B.2 Permit Docket (B.1.2)</b>	
<b>A.2 Part A / Interim Status</b>	Y	.1 Correspondence	
.1 Correspondence		.2 All Other Permitting Documents (Not Part of the ARA)	
.2 Notification and Acknowledgment	Y	<b>C.1 Compliance - (Inspection Reports)</b>	
.3 Part A Application and Amendments		<b>C.2 Compliance/Enforcement</b>	
.4 Financial Insurance (Sudden, Non Sudden)		.1 Land Disposal Restriction Notifications	
.5 Change Under Interim Status Requests		.2 Import/Export Notifications	
.6 Annual and Biennial Reports		<b>C.3 FOIA Exemptions - Non-Releasable Documents</b>	
<b>A.3 Groundwater Monitoring</b>		<b>D.1 Corrective Action/Facility Assessment</b>	Y
.1 Correspondence		.1 RFA Correspondence	
.2 Reports		.2 Background Reports, Supporting Docs and Studies	
<b>A.4 Closure/Post Closure</b>	Y	.3 State Prelim. Investigation Memos	
.1 Correspondence	Y	.4 RFA Reports	Y
.2 Closure/Post Closure Plans, Certificates, etc	Y	<b>D. 2 Corrective Action/Facility Investigation</b>	
<b>A.5 Ambient Air Monitoring</b>		.1 RFI Correspondence	
.1 Correspondence		.2 RFI Workplan	
.2 Reports		.3 RFI Program Reports and Oversight	
<b>B.1 Administrative Record</b>		.4 RFI Draft /Final Report	
		5. RFI QAPP	

Total - 1

.6 RFI QAPP Correspondence		.8 Progress Reports	
.7 Lab Data, Soil-Sampling/Groundwater		<b>D.5 Corrective Action/Enforcement</b>	
.8 RFI Progress Reports		.1 Administrative Record 3008(h) Order	
.9 Interim Measures Correspondence		.2 Other Non-AR Documents	
.10 Interim Measures Workplan and Reports		<b>D.6 Environmental Indicator Determinations</b>	
<b>D.3 Corrective Action/Remediation Study</b>		.1 Forms/Checklists	
.1 CMS Correspondence		<b>E. Boilers and Industrial Furnaces (BIF)</b>	
.2 Interim Measures		.1 Correspondence	
.3 CMS Workplan		.2 Reports	
.4 CMS Draft/Final Report		<b>F Imagery/Special Studies</b> (Videos, photos, disks, maps, blueprints, drawings, and other special materials.)	
.5 Stabilization		<b>G.1 Risk Assessment</b>	
.6 CMS Progress Reports		.1 Human/Ecological Assessment	
.7 Lab Data, Soil-Sampling/Groundwater		.2 Compliance and Enforcement	
<b>D.4 Corrective Action Remediation Implementation</b>		.3 Enforcement Confidential	
.1 CMI Correspondence		.4 Ecological - Administrative Record	
.2 CMI Workplan		.5 Permitting	
.3 CMI Program Reports and Oversight		.6 Corrective Action Remediation Study	
.4 CMI Draft/Final Reports		.7 Corrective Action/Remediation Implementation	
.5 CMI QAPP		.8 Endangered Species Act	
.6 CMI QAPP Correspondence		.9 Environmental Justice	
7			

Note: Transmittal Letter to Be Included with Reports.

Comments: On folder site





## Notification of Hazardous Waste Activity

United States Environmental Protection Agency  
Washington, DC 20460

Please refer to the Instructions for Filing Notification before completing this form. The information requested here is required by law (Section 3010 of the Resource Conservation and Recovery Act).

Official Use Only

Comments

C  
C

Installation's EPA ID Number

Approved

Date Received  
(yr. mo. day)

RECEIVED

C  
FT/A C  
1

A

87 11 12

NOV -5 1987

## I. Name of Installation

SELIG SEALING PRODUCTS INC

## II. Installation Mailing Address

Street or P.O. Box

C  
3

342 E WABASH

City or Town

State

ZIP Code

C  
4

FORREST

IL 61741

## III. Location of Installation

Street or Route Number

C  
5

342 E WABASH

City or Town

State

ZIP Code

C  
6

FORREST

IL 61741

## IV. Installation Contact

Name and Title (last, first, and job title)

Phone Number (area code and number)

C  
2

BENNINGTON WILLIAM

815 657 8233

## V. Ownership

A. Name of Installation's Legal Owner

B. Type of Ownership (enter code)

C  
R

JOSEPH GILES

P

## VI. Type of Regulated Waste Activity (Mark 'X' in the appropriate boxes. Refer to instructions.)

## A. Hazardous Waste Activity

- ☒ 1a. Generator ☐ 1b. Less than 1,000 kg/mo.
- ☐ 2. Transporter
- ☐ 3. Treater/Storer/Disposer
- ☐ 4. Underground Injection
- ☐ 5. Market or Burn Hazardous Waste Fuel (enter 'X' and mark appropriate boxes below)
- ☐ a. Generator Marketing to Burner
- ☐ b. Other Marketer
- ☐ c. Burner

## B. Used Oil Fuel Activities

- ☐ 6. Off-Specification Used Oil Fuel (enter 'X' and mark appropriate boxes below)
- ☐ a. Generator Marketing to Burner
- ☐ b. Other Marketer
- ☐ c. Burner
- ☐ 7. Specification Used Oil Fuel Marketer (or On-site Burner) Who First Claims the Oil Meets the Specification

NOV 12 1987

## VII. Waste Fuel Burning: Type of Combustion Device (enter 'X' in all appropriate boxes to indicate type of combustion device(s) in which hazardous waste fuel or off-specification used oil fuel is burned. See instructions for definitions of combustion devices.)

☐ A. Utility Boiler☐ B. Industrial Boiler☐ C. Industrial Furnace

## VIII. Mode of Transportation (transporters only — enter 'X' in the appropriate box(es))

☐ A. Air ☐ B. Rail ☐ C. Highway ☐ D. Water ☐ E. Other (specify)

## IX. First or Subsequent Notification

Mark 'X' in the appropriate box to indicate whether this is your installation's first notification of hazardous waste activity or a subsequent notification. If this is not your first notification, enter your installation's EPA ID Number in the space provided below.

- ☒ A. First Notification ☐ B. Subsequent Notification (complete item C)

C. Installation's EPA ID Number

C																		T/A	C
W																			1

**X. Description of Hazardous Wastes (continued from front)**

**A. Hazardous Wastes from Nonspecific Sources.** Enter the four-digit number from 40 CFR Part 261.31 for each listed hazardous waste from nonspecific sources your installation handles. Use additional sheets if necessary.

1 F003	2	3	4	5	6
7	8	9	10	11	12

**B. Hazardous Wastes from Specific Sources.** Enter the four-digit number from 40 CFR Part 261.32 for each listed hazardous waste from specific sources your installation handles. Use additional sheets if necessary.

13	14	15	16	17	18
19	20	21	22	23	24
25	26	27	28	29	30

**C. Commercial Chemical Product Hazardous Wastes.** Enter the four-digit number from 40 CFR Part 261.33 for each chemical substance your installation handles which may be a hazardous waste. Use additional sheets if necessary.

31	32	33	34	35	36
37	38	39	40	41	42
43	44	45	46	47	48

**D. Listed Infectious Wastes.** Enter the four-digit number from 40 CFR Part 261.34 for each hazardous waste from hospitals, veterinary hospitals, or medical and research laboratories your installation handles. Use additional sheets if necessary.

49	50	51	52	53	54
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**E. Characteristics of Nonlisted Hazardous Wastes.** Mark 'X' in the boxes corresponding to the characteristics of nonlisted hazardous wastes your installation handles. (See 40 CFR Parts 261.21 — 261.24)



1. Ignitable  
(D001)

☐ 2. Corrosive  
(D002)

☐ 3. Reactive  
(D003)

☐ 4. Toxic  
(D000)

**XI. Certification**

I certify under penalty of law that I have personally examined and am familiar with the information submitted in this and all attached documents, and that based on my inquiry of those individuals immediately responsible for obtaining the information, I believe that the submitted information is true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment.

Signature

Name and Official Title (type or print)

William J. Bennington  
Manager, Technical Services

Date Signed

11/2/87



TO: Permit Section

DATE: 8/20/93

FROM: Deborah Paxton

☒ Information only

SUBJECT: \_\_\_\_\_

☐ Response requested

A drive by the facility on August 17, 1993 revealed that the facility is indeed still using the west end of the metal storage building for storage of wastes. The metal building is easily accessible; however, I didn't ~~stop to~~ determine if the facility is using secondary containment for their stored hazardous waste. The closure plan did not cover in detail the descriptions for removing, transporting, treating, storing or disposing of their hazardous wastes. I don't believe they have identified the off site HWMU's they will be using.

Selig Sealing has not <sup>fully</sup> addressed their proposed temporary hazardous waste storage area, located at the east end of the metal storage building, <sup>that</sup> they are planning on using during closure of their WMU's (ie, secondary containment wasn't dismissed -- I'm concerned since the metal storage building has a gravel floor).

Due 8/23/93nm

*Champion*

CLOSURE LOG # : 710  
FACILITY : SELIG SEALING PRODUCTS INC  
STATE ID # : 1050455002  
FED ID # : ILD066197195  
STATUS : A  
TYPE :  
NOTIFY RPMS : Y

LOCATION : FORREST  
COUNTY : LIVINGSTON *WTS*  
REVIEWER : WTS  
GAW REVIEWER :  
NOTIFY FOS : Y  
NOTIFY CMS : Y  
FN :  
INSP :  
2nd-SCHED :  
2nd-RECD :  
60-DUE :  
2-MAILED :

1st-RECD : 93/07/23  
90-DUE : 93/10/21  
1-MAILED :  
APP or REJ :

CERTIFICATION DUE :  
CLOSED :  
UNITS CLOSED :  
UNITS REMAIN :  
G OR T STATUS:  
COMMENTS :

CERTIFICATION RECD :  
CLEAN CLOSURE :  
CIL SENT :  
PECL SENT :

*See attached sheet ... Deborah Paxton*

CONTAM SOIL-Y/N/? : ABOVE POL-Y/N/? : ABOVE CUO-Y/N/? :  
CONTAM-VO/SVO/M/? :  
CONTAM GW-Y/N/? : ABOVE POL-Y/N/? : ABOVE CUO-Y/N/? :  
CONTAM-VO/SVO/M/? :

*August 20, 1993*

REMEDATION-PROP/IN PROG/COMPLETE/NA:

VOLUME:

UNIT-T/CY:

SOIL VENT-Y/N:  
CAP IN PLACE-Y/N:  
LANDFILL-Y/N/ON/OFF:

AERATE-Y/N/ON/OFF:  
BIOREM-Y/N:  
TREATMENT-Y/N/ON/OFF:

STABILIZE-Y/N/ON/OFF:  
INCIN-Y/N/ON/OFF:  
PUMP & TREAT GW-Y/N:

PROCESS 1:	AMOUNT 1:	UNIT1:	ADD/DEL:
PROCESS 2:	AMOUNT 2:	UNIT2:	ADD/DEL:
PROCESS 3:	AMOUNT 3:	UNIT3:	ADD/DEL:
PROCESS 4:	AMOUNT 4:	UNIT4:	ADD/DEL:
PROCESS 5:	AMOUNT 5:	UNIT5:	ADD/DEL:
PROCESS 6:	AMOUNT 6:	UNIT6:	ADD/DEL:

**RECEIVED**

**AUG 23 1993**

IEPA - BOL  
PERMIT SECTION

- 1) COMPLETE CLOSURE CHECKLIST
- 2) CALL FOS & MAKE SURE THESE ARE CORRECT AREAS TO CLOSE
- 3) STORAGE AREA INTEGRITY (CRACKS, GAPS, JOINTS, CURBS, ETC.)
- 4) STORAGE AREA RUNOFF/DRAINAGE
- 5) SAMPLING PARAMETERS W.R.T. WASTES MANAGED
- 6) SAMPLING METHODS AND LOCATIONS AND DEPTHS
- 7) ANALYTICAL METHODS (SW-846)
- 8) REVIEW NOTES
  - a. Intro to Project -- Site name, location, brief description of submitta
  - b. Pertinent Site History
  - c. Summary/Review/Evaluation of Submittal
  - d. Identification of Final Action to be Taken
  - e. Discussion of Final Action, Including Discussion of Final Letter
- 9) COMPUTER BLANKS





State of Illinois

# ENVIRONMENTAL PROTECTION AGENCY

File A.4.3  
US EPA

Mary A. Gade, Director

2200 Churchill Road, Springfield, IL 62794-9276

217/524-3300

October 17, 1995

Selig Sealing Products, Inc.  
Attn: Mr. Bill Bennington  
342 East Wabash  
Post Office Box 37  
Forrest, Illinois 61741

Re: 1050455002 -- Livingston County  
Selig Sealing Products, Inc.  
ILD066197195  
RCRA-Closure  
Closure Log #C-710  
Received: August 9, 1995

Dear Mr. Bennington:

This is in response to the certification of closure submitted by Environmental Science & Engineering, Inc. for the hazardous waste container storage area (referred to as WMU-2) at the above-referenced facility. This certification, signed by a representative of the owner/operator, Joseph M. Giles and an independent registered professional engineer, Michael J. Hoffman, P.E. indicated that the subject hazardous waste management unit had been closed in accordance with the plan initially approved by the Agency on September 20, 1993.

The subject hazardous waste management unit was inspected by a representative of this Agency on September 14, 1995. The inspection revealed that the unit was closed in accordance with the approved closure plan. In addition, a review of the closure certification and accompanying closure documentation report also indicates that the unit was closed in accordance with the approved closure plan. Therefore, the Agency has determined that closure of WMU-2 has apparently met the requirements of 35 IAC 725.

As a result of completing closure of the subject hazardous waste management unit:

1. No further action is necessary to fulfill the requirements of the closure plan initially approved by the Agency on September 20, 1993 for two hazardous waste container storage areas at the above-referenced facility. The Agency previously accepted certification of closure for the other storage area, referred to as WMU-1 on April 26, 1994.
2. This facility must continue to meet the requirements of 35 IAC 722 Standards Applicable to Generators of Hazardous Waste and 35 IAC 728 Land Disposal Restrictions.





Page 2

Should you have any questions regarding this matter, please contact William T. Sinnott, II at 217/524-3300.

Sincerely,

A handwritten signature in cursive script, appearing to read "Edwin C. Bakowski".

Edwin C. Bakowski, P.E.  
Manager, Permit Section  
Bureau of Land

ECB:WTS/mls/406X/21-22

JEM

cc: USEPA Region V, Hak Cho  
Michael J. Hoffman, P.E.





State of Illinois

# ENVIRONMENTAL PROTECTION AGENCY

Mary A. Gade, Director

2200 Churchill Road, Springfield, IL 62794-9276

## MEMORANDUM

DATE: OCTOBER 25, 1993  
TO: BUREAU OF LAND RCRA CLOSURE FILE  
FROM: JACKIE MUCHOW *JSM*  
SUBJECT: 1050455002/CHAMPAIGN COUNTY  
SELIG SEALING PRODUCTS, INC.  
RCRA LOG #: C-710  
PUBLIC NOTICE #: 93021  
RCRA CLOSURE

RECEIVED  
WMD RCRA **DEC 16 1993**  
RECORD CENTER

## NOTICE OF CLOSURE

Notice of closure of Selig Sealing Products, Inc. two hazardous waste container storage areas located in Forrest, IL. first appeared in the Pontiac Daily Leader on September 24, 1993. The public comment period ended October 24, 1993. No comments have been received by this office.

cc: Champaign Regional Office  
William T. Sinnott II

JSM







State of Illinois

# ENVIRONMENTAL PROTECTION AGENCY

p435 100 784

File

Mary A. Gade, Director  
217/524-3300

2200 Churchill Road, Springfield, IL 62794-9276

September 20, 1993

Selig Sealing Products, Inc.  
342 E. Wabash  
P.O. Box 37  
Forrest, Illinois 61741

RECEIVED  
WMD RCRA  
RECORD CENTER  
DEC 16 1993  
A.4.1

Re: 1050455002 -- Livingston County  
Selig Sealing Products, Inc.  
ILD066197195  
Log No. C-710  
Received: July 23, 1993  
RCRA Closure

Gentlemen:

The closure plan submitted on behalf of Selig Sealing Products by Environmental Science and Engineering has been reviewed by this Agency. Your final closure plan to close the two hazardous waste container (S01) storage areas at the above-referenced facility (referred to as WMU-1 and WMU-2 as shown in Appendix B of the closure plan) is hereby approved subject to the following conditions and modifications:

1. Closure activities must be completed by March 15, 1994. When closure is complete the owner or operator must submit to the Agency certification both by the owner or operator and by an independent registered professional engineer that the facility has been closed in accordance with the specifications in the approved closure plan. This certification must be received at this Agency within sixty (60) days after closure, or by May 15, 1994. These dates may be revised if Selig Sealing Products, Inc. finds that additional time is required to complete the prescribed closure activities and Selig Sealing Products demonstrates it is attempting to complete the required closure activities in a timely manner.

The attached closure certification form must be used. Signatures must meet the requirements of 35 Ill. Adm. Code Section 702.126. The independent engineer should be present at all critical, major points (activities) during the closure. These might include soil sampling, soil removal, backfilling, final cover placement, etc. The frequency of inspections by the independent engineer must be sufficient to determine the adequacy of each critical activity. Financial assurance must be maintained for the units approved for closure herein until the Agency approves the facility's closure certification.

The Illinois Professional Engineering Act (Ill. Rev. Stat., Ch. 111, par. 5101 et. seq.) requires that any person who practices professional engineering in the State of Illinois or implies that he (she) is a professional engineer must be registered under the Illinois Professional Engineering Act (par. 5101, Sec. 1). Therefore, any certification or engineering services which are performed for a closure plan in the State of Illinois must be done by an Illinois P.E.

Plans and specifications, designs, drawings, reports, and other documents rendered as professional engineering services, and revisions of the above must be sealed and signed by a professional engineer in accordance with par. 5119, sec. 13.1 of the Illinois Professional Engineering Act.

As part of the closure certification, to document the closure activities at your facility, a Closure Documentation Report which must be submitted which includes the following:

- a. The volume of waste, waste residue and contaminated soil (if any) removed. The term waste includes wastes resulting from decontamination activities.
- b. Scaled drawings showing the horizontal and vertical boundaries of the extent of any soil removal effort.
- c. A description of the method of waste handling and transport.
- d. The waste manifest numbers.
- e. Copies of the waste manifests.
- f. Information documenting the results of all sampling/analysis efforts. The goal of presenting this information should be to describe, in a logical manner, the activities and results associated with the sampling/analysis effort. At a minimum, this information must include:
  1. identification of the reason for the sampling/analysis effort and the goals of the effort;
  2. a summary in tabular form of all analytical data, including all quality assurance/quality control data;
  3. a scaled drawing showing the horizontal location from which all soil samples were collected;
  4. identification of the depth and vertical interval from which each sample was collected;
  5. a description of the soil sampling procedures, sample preservation procedures and chain of custody procedures;
  6. identification of the test method used and detection limits achieved, including sample preparation, sample dilution (if necessary) and analytical inferences;
  7. copies of the final laboratory report sheets, including final sheets reporting all quality assurance/quality assurance dates;

8. visual classification of each soil sample in accordance with ASTM D-2488;
  9. a summary of all procedures used for quality assurance/quality control, including the results of these procedures; and
  10. a discussion of the data, as it relates to the overall goal of the sampling/analysis effort.
- g. A chronological summary of closure activities and the cost involved.
- h. Color photo documentation of closure. Document conditions before, during and after closure.

The original and two (2) copies of all certifications, logs, or reports which are required to be submitted to the Agency by the facility should be mailed to the following address:

Illinois Environmental Protection Agency  
Bureau of Land -- #33  
Permit Section  
2200 Churchill Road  
Post Office Box 19276  
Springfield, Illinois 62794-9276

2. If the Agency determines that implementation of this closure plan fails to satisfy the requirements of 35 Ill. Adm. Code, Section 725.211, the Agency reserves the right to amend the closure plan. Revisions of closure plans are subject to the appeal provisions of Section 40 of the Illinois Environmental Protection Act.
3. If contamination is detected, the Agency must be notified in writing within fifteen (15) days. A revised closure plan addressing remediation of the contamination detected must be submitted within timeframes established by the Agency.
4. Under the provisions of 29 CFR 1910 (51 FR 15,654, December 19, 1986), cleanup operations must meet the applicable requirements of OSHA's Hazardous Waste Operations and Emergency Response standard. These requirements include hazard communication, medical surveillance, health and safety programs, air monitoring, decontamination and training. General site workers engaged in activities that expose or potentially expose them to hazardous substances must receive a minimum of 40 hours of safety and health training off site plus a minimum of three days of actual field experience under the direct supervision of a trained experienced supervisor. Managers and supervisors at the cleanup site must have at least an additional eight hours of specialized training on managing hazardous waste operations.

5. The concrete surfaces at WMU-1 shall be visually inspected, photographed and any residue adhering to the surface must be removed by scraping and/or brushing. Following this, the concrete surface must be steam cleaned and triple rinsed. Decontamination of these surfaces will be considered complete after they are triple rinsed. All wash and rinse water shall be collected. This water must be analyzed for the characteristics of hazardous waste as set forth in 35 IAC 721, Subpart C. If the wash or rinse water samples exhibit a characteristic of hazardous waste then that material must be managed as a hazardous waste. In any event the material must be managed as a special waste.

After cleaning the concrete surfaces, an independent registered professional engineer shall inspect the integrity of the concrete surfaces as it relates to the ability of these surfaces to contain liquid. This surface shall be inspected for cracks which penetrate through the concrete. In addition, all construction joints must be inspected to ensure they are watertight. This inspection must be carried out in accordance with standards and recommendations of professional/technical entities such as the American Concrete Institute, the Portland Cement Association the American Society for Testing and Materials, the American Society of Civil Engineers, etc. which relate to the ability of concrete surfaces to contain liquids. The results of this inspection shall be (1) documented in the form of a report, and (2) certified by an independent Illinois registered professional engineer in accordance with 35 IAC 702.106. A copy of this report must be submitted along with the closure documentation report required by Condition 1 above. The report must include:

- a. The results of the inspection;
  - b. Scaled drawings showing the location of all cracks and construction joints observed during the inspection;
  - c. Conclusions reached regarding the potential for hazardous wastes and/or hazardous constituents to migrate through any cracks or construction joints observed in the areas of concern;
  - d. Justification for the conclusions reached (e.g., information must be provided which indicates that any construction joints in the area of concern are indeed watertight); and
  - e. Photographs to support the conclusions reached.
6. If joints or other defects are found in the base of the storage areas during the inspection required by Condition 5 above which would potentially allow hazardous waste or hazardous constituents to migrate through them, then soil samples must be collected from beneath them to determine if hazardous waste or hazardous constituents have been released to the underlying soil.



- a. Samples must be collected from at least one location along each joint/crack. The location from which samples are collected along each crack must be biased to any area where there is staining or any low-lying area along the joint/crack.
  - b. Samples must be collected once every 10' along each individual crack;
  - c. Samples must be collected from 0"-6" and from 18"-24" at each location;
  - d. The procedures used to collect and analyze all samples shall be carried out in accordance with the procedures approved in this letter.
7. All soil samples shall be analyzed for volatile organic compounds (VOCs) using Method 8240 in SW-846. The PQLs identified in Table 1 of Method 8240 must be achieved during these analyses and all the VOCs listed in this table must be analyzed for;
8. To ensure the clean-closure requirements of 35 IAC 725.211 and 725.214 are met, all soil which remains beneath and around WMU-1 (if soil sampling is necessary) and WMU-2 must meet the following clean-up objectives (CUOs):

<u>Compound</u>	<u>Objective (mg/kg)</u>
Acetone	0.7
Benzene	0.005
Ethyl Benzene	0.7
Methyl Ethyl Ketone	0.10
Mineral Spirits	1.0
Xylene	10.0

9. The Agency shall be notified in writing if contaminants not listed in Condition 8 are detected above their respective practical quantitation limit. This notification shall identify the additional constituents detected and the concentration at which they were detected. The Agency will review this information and establish cleanup objectives for the newly detected contaminants, if necessary. The sampling and analysis effort being carried out to determine the extent of contamination shall not be delayed while the Agency is reviewing this information.
10. If soil is encountered during the sampling/analysis efforts required by Condition 6 above which contains contaminants above the CUOs established in Condition 8 above, the additional soil samples must be collected, as necessary to determine the horizontal and vertical extent of soil which exceed these CUOs. The procedures used to collect and analyze these samples must be in accordance with those approved in this letter. The procedures used to determine the horizontal and vertical locations from which soil samples are to be collected in accordance with Sections 13.a and 13.b of the Agency's RCRA closure plan instructions (revised December 1990). However, no random sampling shall be used in making this determination.

11. All soil samples shall be analyzed individually (i.e., no compositing). Sampling and analytical procedures shall be conducted in accordance with Test Methods for Evaluating Solid Wastes, Third Edition (SW-846) and Attachment 7 to this Agency's closure plan instruction package. When a SW-846 (Third Edition) analytical method is specified, all the chemicals listed in the Quantitation Limits Table for that method shall be reported unless specifically exempted in writing by the Agency. When visually discolored or contaminated material exists within an area to be sampled, horizontal placement of sampling locations shall be adjusted to include such visually discolored and/or contaminated areas. Sample size per interval shall be minimized to prevent dilution of any contamination. Apparent visually contaminated material within a sampling interval shall be included in the sample portion of the interval to be analyzed.
12. In addition to scraping steam cleaning and triple rinsing the concrete pads, all equipment and devices involved in the closure shall be steam cleaned and triple rinsed.
13. Contaminated soil may be excavated and disposed off-site any time during closure. The goal of any such effort should be to remove all soil which exceeds the established cleanup objectives.
14. If soil excavation is the chosen remedial action for any soil contamination encountered, then soil samples must be collected for analysis from the bottom and sidewalls of the final excavation from which contaminated soil was removed. This sampling and analysis effort must be (1) sufficient to demonstrate that the remaining soil meets the established cleanup objectives and (2) carried out in accordance with the following procedures:
  - a. A grid system as set forth in Section 13.b of the Agency's closure plan instructions must be established over the excavation.
  - b. Samples must be collected from the floor of the excavation at each grid intersection, including intersections along the perimeter of the excavation.
  - c. Samples must be collected 6"-12" from the top of the excavation wall at each grid intersection around the excavation perimeter. Samples must also be collected at the midpoint of the excavation wall at each grid intersection along the excavation perimeter.
  - d. Collection/analysis of all required samples must be in accordance with the procedures approved in this letter.
  - e. Soil samples which must be analyzed for volatile organic compounds shall be collected using Attachment 7 of the Agency's RCRA closure plan instructions. In addition, such samples must be collected 6"-12" beneath the floor/sidewalls of the excavation to minimize the possibility of volatilization of the contaminants prior to the collection of the samples.

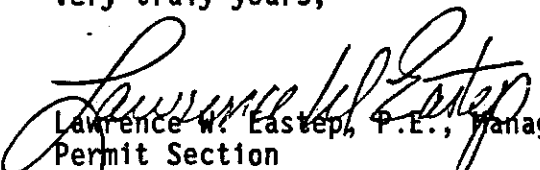
- f. No random sampling shall be conducted to verify that the cleanup objectives have been met.
15. If soil excavation is the chosen remedial action for any soil contamination encountered, then additional soil must be removed, as necessary, until it can be demonstrated that the remaining soil in and around the area of concern meets the established cleanup objectives. Additional samples must be collected and analyzed in accordance with Condition 14 above from areas where additional soil has been removed.
16. If a decision is made that soil excavation and off-site disposal is not the preferred remedial action for this closure, then the Agency must be notified in writing when such a determination is made. At that time, the Agency will provide Selig Sealing Products with additional guidance regarding the information which must be submitted to the Agency for review and approval relative to the alternative remedial action which the facility would like to implement.
17. The Agency must be notified in writing if, at any time, it is found that soil contamination above the established cleanup objectives extends to near the water table. This notification must be made within 15 days after such a discovery is made. A plan to investigate for potential groundwater contamination must be submitted to the Agency for review and approval within 60 days after the initial written notification is submitted to the Agency.
18. If groundwater is encountered during any soil removal or sampling activities prior to reaching soil which meets the cleanup objectives, the plan to investigate for potential groundwater contamination must be submitted to the Agency for review and approval. Such a plan must be submitted within sixty (60) days after the date that the analytical results are received which indicate that soil contamination extends to the water table. In addition, the Agency shall be notified in writing of this discovery within five (5) days after these analytical results are received.
19. If clean closure cannot be achieved pursuant to 35 IAC 725.211 and 725.214, then a modified closure plan and a post-closure plan prepared pursuant to 35 IAC Section 725, Subpart G must be submitted to the Agency for review and approval within 60 days of such a determination.
20. To avoid creating another regulated storage unit during closure, it is recommended that you obtain any necessary permits for waste disposal prior to initiating excavation activities. If it is necessary to store excavated hazardous waste on-site prior to off-site disposal, do so only in containers or tanks for less than ninety (90) days. Do not create regulated waste pile units by storing the excavated hazardous waste in piles. The ninety (90) day accumulation time exemption (35 IAC 722.134) only applies to containers and tanks.

21. Please be advised that the requirements of the Responsible Property Transfer Act (Public Act 85-1228) may apply to your facility due to the management of RCRA hazardous waste. In addition, please be advised that if you store or treat on-site generated hazardous waste in containers or tanks pursuant to 35 IAC 722.134, those units are subject to the closure requirements identified in 35 IAC 722.134(a)(1).
22. All hazardous wastes that result from this project are subject to annual reporting as required in 35 IAC 722.141 and shall be reported to the Agency by March 1 of the following year for wastes treated and left on-site or shipped off-site for storage, treatment and/or disposal during any calendar year. Additional information and appropriate report forms may be obtained from the Agency by contacting:

Facility Reporting Unit  
Bureau of Land  
Illinois Environmental Protection Agency  
2200 Churchill Road  
P.O. Box 19276  
Springfield, Illinois 62794-9276

Should you have any questions regarding this matter, please contact William T. Sinnott II at 217/524-3300.

Very truly yours,

  
Lawrence W. Eastep, P.E., Manager  
Permit Section  
Division of Land Pollution Control  
Bureau of Land

LWE:WTS:sf/sp/694Y,1-8  
Jen

cc: USEPA Region V -- George Hamper

bcc: Bureau File  
Champaign Region  
Jim Moore  
Bill Sinnott



ATTACHMENT

This statement is to be completed by both the responsible officer and by the registered professional engineer upon completion of closure. Submit one copy of the certification with original signatures and three additional copies.

Closure Certification Statement

Closure Log C-710

The one (1) hazardous waste container storage area (S01) at the facility described in this document been closed in accordance with the specifications in the approved closure plan. I certify under penalty of law that this document and all attachments were prepared under my direction or supervision in accordance with a system designed to assure that qualified personnel properly gather and evaluate the information submitted. Based on my inquiry of the person or persons who manage the system, or those persons directly responsible for gathering the information, the information submitted is, to the best of my knowledge and belief, true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment for knowing violations.

\_\_\_\_\_  
USEPA ID Number

\_\_\_\_\_  
Facility Name

\_\_\_\_\_  
Signature of Owner/Operator      Date

\_\_\_\_\_  
Name and Title

\_\_\_\_\_  
Signature of Registered P.E.      Date

\_\_\_\_\_  
Name of Registered P.E. and Illinois  
Registration Number

\_\_\_\_\_  
Mailing Address of P.E.:  
\_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_

\_\_\_\_\_  
Registered P.E.'s Seal:

WTS:sf/sp/694Y,9



Facility No.: 1050455002  
Public Notice: 93021

Date: August 2, 1993

NOTICE OF CLOSURE  
CLOSURE NO. C-710

A plan to close the 2 hazardous waste container storage areas located at Selig Sealing Products, Inc., has been submitted to the Illinois Environmental Protection Agency (IEPA) pursuant to Subpart G of 35 Ill. Adm. Code 725. The facility is located at 324 E. Wabash, Forrest, Illinois. Selig Sealing Products, Inc. is a manufacturer of safety/protective seals. The facility will remain in operation during and following closure of the hazardous waste management units described in this notice.

At this time the IEPA is also requesting that the facility provide information concerning any prior release of hazardous waste constituents from any solid waste management facility on the site.

Interested persons are invited to submit written comments on the plan or request modifications of the plan or provide information on the release, at any time, of hazardous waste constituents from the facility, within 30 days of the first publication date of this notice. Written comments must be addressed to the IEPA, Bureau of Land, Permit Section #33, Attn: William T. Sinnott II, 2200 Churchill Road, P.O. Box 19276, Springfield, Illinois 62794-9276, telephone number 217/524-3300.

The site must be closed in accordance with the standards set forth in the Environmental Protection Act, Ill. Rev. Stat., Ch. 111 1/2, Pars. 1001 et seq., and regulations adopted thereunder.

The proposed closure plan, closure performance requirements, and other documents are available for inspection and may be copied at the IEPA's Springfield headquarters.

An appointment to inspect or copy the proposed closure plan must be made in advance by contacting the Bureau of Land, Freedom of Information Act (FOIA) coordinator at 2200 Churchill Road, P.O. Box 19276, Springfield, Illinois 62794-9276, 217/782-6760. Please refer to the closure number under the heading at the top of this advertisement when contacting the FOIA coordinator.

In response to requests or at the discretion of the IEPA, a public hearing may be held to clarify one or more issues concerning the closure plan. Public notice will be issued 30 days before any public hearing.

JM/mls/626Y/91-92



217/782-6762

file  
CERTIFIED MAIL #: p 435100 712  
RETURN RECEIPT REQUESTED

July 27, 1993

Selig Sealing Products, Inc.  
342 East Wabash  
Forrest, Illinois 61741

Re: IEPA #: 1050455002 -- Livingston County  
Facility Name: Selig Sealing Products, Inc.  
USEPA ID#: ILD066197195  
RCRA Closure File

Dear Environmental Coordinator:

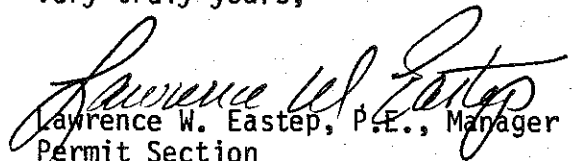
As you are aware, we are currently evaluating the request for closure of your facility as referenced above, and which is regulated under the Resource Conservation and Recovery Act (RCRA).

Under Section 206 and Section 233 (copies enclosed) of the Hazardous and Solid Waste Amendments of 1984, all facilities "seeking a permit" (taken to mean interim status facilities) must provide for corrective action for all releases of hazardous waste or constituents from any solid waste management unit, regardless of the time at which waste was placed in the Unit. Please note that both hazardous and non-hazardous wastes can meet the definition of solid waste under 40 CFR 261.2.

Consequently, we must determine whether such releases have ever occurred at the facility site. If they have, we must ensure that any necessary corrective actions either have been taken, or will be taken, pursuant to a decision on your closure plan. An important part of our determination includes your willingness (or unwillingness) to complete the enclosed certification form. Please read it carefully, complete it, and either sign and return it, or return it to us unsigned with a cover letter of explanation, within 30 days of the date of this letter.

Please call the Permit Section at 217/782-6762 if you have any questions, or wish to discuss this matter further.

Very truly yours,

  
Lawrence W. Eastep, P.E., Manager  
Permit Section  
Division of Land Pollution Control  
Bureau of Land

Enclosures

cc: George Hamper, USEPA - Region V



C-710



Environmental  
Science &  
Engineering, Inc.

cc: Champaign  
J. Muchow

JKH  
WTS

July 22, 1993

Mr. Jim Moore  
Illinois Environmental Protection Agency  
RCRA Closure Group  
2200 Churchill Road  
P.O. Box 19276  
Springfield, IL 62794-9276

Re: 1050455002--Livingston County  
Selig Sealing Products, Inc.  
ILD066197195

Dear Mr. Moore:

Enclosed please find an original and two (2) copies of the RCRA Hazardous Waste Management System Closure Plan for the above referenced facility. If there are any questions, please feel free to contact the undersigned at your convenience.

Sincerely,

ENVIRONMENTAL SCIENCE & ENGINEERING, INC.

*Ted W. Nehrkorn*

Ted W. Nehrkorn  
Environmental Engineer

TWN:ldw\_ltr\_Selig\_IEPA\_072293

Enclosures

**RECEIVED**

**JUL 23 1993**

**IEPA - BOL  
PERMIT SECTION**



**RCRA HAZARDOUS WASTE MANAGEMENT  
SYSTEM CLOSURE PLAN**

**Prepared for:**

**Selig Sealing Products, Inc.  
342 E. Wabash  
Post Office Box 37  
Forrest, Illinois 61741**

**ILD066197195**

**RECEIVED**

**JUL 23 1993**

**IEPA - SOL  
PERMIT SECTION**

**Prepared by:**

**ENVIRONMENTAL SCIENCE & ENGINEERING, INC.  
8901 North Industrial Road  
Peoria, Illinois 61615**

**July 21, 1993**

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## APPENDICES

- Appendix A Facility Location
- Appendix B Facility Map
- Appendix C Analytical Parameters and Practical Quantitation Limits
- Appendix D Soil Sample Location Map for WMU-2



## **1.0 PURPOSE**

This document provides for the closure of the RCRA hazardous waste storage area at the Selig Sealing Products, Inc. facility located in Forrest, Illinois. This Closure Plan is prepared to protect human health and the environment in accordance with the requirements of 35 Illinois Administrative Code Parts 724 and 725.

## 2.0 FACILITY INFORMATION

Owner: Selig Sealing Products, Inc.

Owner Address and Phone Number: Selig Sealing Products, Inc.  
324 S. Edgewood  
LaGrange, Illinois 60525  
(708) 579-3877

Facility Address and Phone Number: Selig Sealing Products, Inc.  
342 E. Wabash  
Post Office Box 37  
Forrest, Illinois 61741  
(815) 657-8265

Facility Contact: Mr. William Bennington

Facility Location: USGS Map identifying facility location is included as Appendix A.

### 3.0 DESCRIPTION OF FACILITY

The Selig Sealing Products, Inc. facility is located at 342 E. Wabash, Forrest, Illinois in Livingston County. A facility map is presented in Appendix B. Selig Sealing Products, Inc. manufactures safety/protective seals for distribution to various product manufacturers and is classified under SIC Number 3053. There are approximately 63 persons employed at the facility.

#### 3.1 Descriptions of Processes

Selig's safety/protective seal Laminator 5 manufacturing process consist of two separate processes. Process A is a lamination procedure. A roll of material is unwound and passed through a coater station where a solvent based or water-based adhesive is applied. The coated material then passes through a drier oven where the solvent or water carrier is evaporated to the atmosphere. A second roll of material is then attached to the adhesive side of the coated material and rewound.

Process B is a printing process. Laminated material from the above process is passed through a two color printing press using either solvent based or water based ink.

Process A and B produce waste containing methyl ethyl ketone during use of solvent based adhesives or ink. This waste is classified as hazardous waste due to a flash point lower than 140°F. When water based adhesives or ink is used during manufacturing, the waste is non-hazardous as long as the flashpoint of the waste remains above 140°F.

Process C or the Laminator 1 process functions as a material lamination process. A roll of material is unwound and passed through a coater station where a water based adhesive is applied. The coated material then is attached to a second roll of material completing the lamination procedure.

The waste produced from this process and the cleanup of the process is classified as non-hazardous.

#### 3.2 Waste Streams Generated at Facility

The laminating/printing process generates two waste streams. The water based ink process generates approximately 6,200 gallons of non-hazardous waste annually. The waste is generated in the Laminator 5 and Extruder department and stored in the Print Plate Storage Area.

Adhesive and ink waste streams are also generated from the Laminator 5 and are classified as hazardous due to a flashpoint below 140°F. This process generates approximately 30,000 pounds of hazardous waste annually. The adhesive and ink waste is stored in the Solvent Storage Area.

#### 4.0 DESCRIPTION OF WASTE MANAGEMENT UNITS TO BE CLOSED

Seven drums of non-hazardous water based ink generated at the facility were rejected by Liquid Recovery Systems in Chicago due to a flashpoint less than 140°F. The drums were then returned to the facility and stored at two locations until they were finally shipped off-site as hazardous waste on or before May 13, 1993. The locations of the waste management units are identified in the facility diagram contained in Appendix B.

The lowered flashpoint appears to have resulted due to the presence of methyl ethyl ketone (MEK) in at least one of the drums. The MEK was either accidentally added to the drums by an employee or residual MEK remained in the empty drums which were reused for waste shipment. Records at the facility indicate that the accumulation of the wastes dated back to October 1992, indicating that storage of the materials had exceeded the allowable 90 days.

##### Waste Management Unit WMU-1

Waste Management Unit WMU-1 is identified as an approximately 8 foot by approximately 10 foot area and located in the southwestern portion of the main building between the former print room and the wax/adhesive storage room. The unit is identified in the diagram included in Appendix B. The 6-inch concrete floor is in good condition with only minor cracking. There are no floor drains located in this area. The drums containing the hazardous waste were stored in this area during a period between January and May 1993. The area is not currently used to store any wastes or materials.

##### Waste Management Unit WMU-2

Waste management Unit WMU-2 is situated in the west end of the metal storage building situated south of the main process building. WMU-2 is designated as a 30 ft. by 30 ft. gravel covered area. A site map is presented in Appendix B identifying the location of WMU-2. The gravel area is in good condition with no visual staining observed. The unit is currently used as storage for hazardous, and non-hazardous waste, and raw materials. The seven drums were stored in this area during a period between October 1992 and May 1993.

## **5.0 DESCRIPTION OF CLOSURE**

The closure activities for the hazardous waste storage unit are included in the following sections.

### **5.1 Removal of Remaining Waste**

All hazardous waste will be removed from WMU-1 and WMU-2 prior to decontamination/sampling activities. A temporary hazardous waste storage area will be set up in the eastern end of the metal storage building during closure activities.

### **5.2 Decontamination of WMU-1**

Any debris or residue on the concrete slab will be collected for disposal by sweeping or shoveling. The pad will be steam cleaned and triple rinsed to remove residues from any waste spilled during storage. A composite sample of the rinsate will be collected in accordance with the USEPA SW-846 standards. The sample will be analyzed for volatile organic compounds (VOCs) using USEPA Method 8240. Rinse water from the decontamination process will be collected in clean 55-gallon drums and disposed of following local, state, and federal agency requirements. The parameters that will be specified for analysis and the practical quantitation limits (PQLs) for the parameters are presented in Appendix C.

### **5.3 Soil Sampling Plan WMU-2**

The proposed soil sampling plan includes soil borings and subsurface soil sampling. The purpose of the soil sampling plan is to identify soil contamination in the vicinity of WMU-2. The soil sample locations were determined by establishing a local grid and assigning a series of consecutive numbers to the units of the grid. A total of sixteen (16) locations will be sampled including 12 locations within the storage area and 1 along each side of the area. A soil location map is provided in Appendix D.

Two soil samples will be collected at each location including one at the soil/gravel interface and one at a depth of 6-12 inches below the soil/gravel interface in accordance with IEPA protocol for VOC samples (Attachment 7) and USEPA SW-846 protocol.

Based on the hazardous waste stored at the WMU-2 unit, the soil samples will be analyzed for VOCs using USEPA Method 8240. The parameters that will be analyzed and the practical quantitation limits (PQLs) for these parameters are presented in Appendix C.

#### **5.4 Soil Clean-up Objectives**

Soil clean-up objectives will be developed by the IEPA in response to the laboratory analysis of soil samples collected at the facility. It is anticipated that these objectives will be based on Class II Groundwater Clean-up Objectives due to the absence of residential and municipal wells near the storage areas. In the event that soil contamination is identified, soil excavation and disposal is proposed. Significant or widespread contamination is not anticipated and would warrant modification of this Plan.

#### **5.5 Decontamination of Sampling Equipment**

Decontamination of sampling equipment will follow USEPA SW-846 standards. Downhole drilling and soil sampling equipment will be steam cleaned prior to, and between each boring. Decontamination water will be containerized for disposal as described in Section 5.2.

## 6.0 PERSONNEL SAFETY, FIRE PROTECTION, AIR EMISSIONS

No unusual personnel safety, fire protection, or air emission issues are anticipated during the site closure activities. A site safety plan will be developed to address the health and safety of personnel and contractors involved in closure activities.

The following reference may be consulted for additional guidance and safety procedures.

Standard Operating Safety Guides, United State Environmental Protection Agency, Office of Emergency and Remedial Response, November 1984.

Personnel involved in performing the remedial activities at this site will have completed OSHA hazardous worker training prior to initiating work.



## 7.0 SCHEDULE FOR CLOSURE

The following schedule represents the proposed closure schedule for the storage area. The schedule is based on an IEPA approval by September 25, 1993; any extension or delay in approval will require modification to the schedule.

<u>Activity</u>	<u>Date</u>
Submit Closure Plan	July 25, 1993
IEPA Approval of Closure Plan	October 25, 1993
Complete Decontamination	December 1, 1993
Closure Subsurface Sampling	December 15, 1993
Submit Lab Data to IEPA	February 1, 1994
Receive IEPA Clean-up Objectives	March 15, 1994
Certify Closure (Independent Professional Engineer & Responsible Corporate Officer)	April 25, 1994

M

708-955-6779

618-942-2844

## **8.0 CERTIFICATION**

A Closure Documentation Report signed by an independent professional engineer and a responsible corporate officer will be submitted within 60 days after completion of closure.

## 9.0 STATUS OF FACILITY AFTER CLOSURE

Following closure of the hazardous waste storage areas, the facility will be a large quantity generator of hazardous waste (>1,000 kg/month).

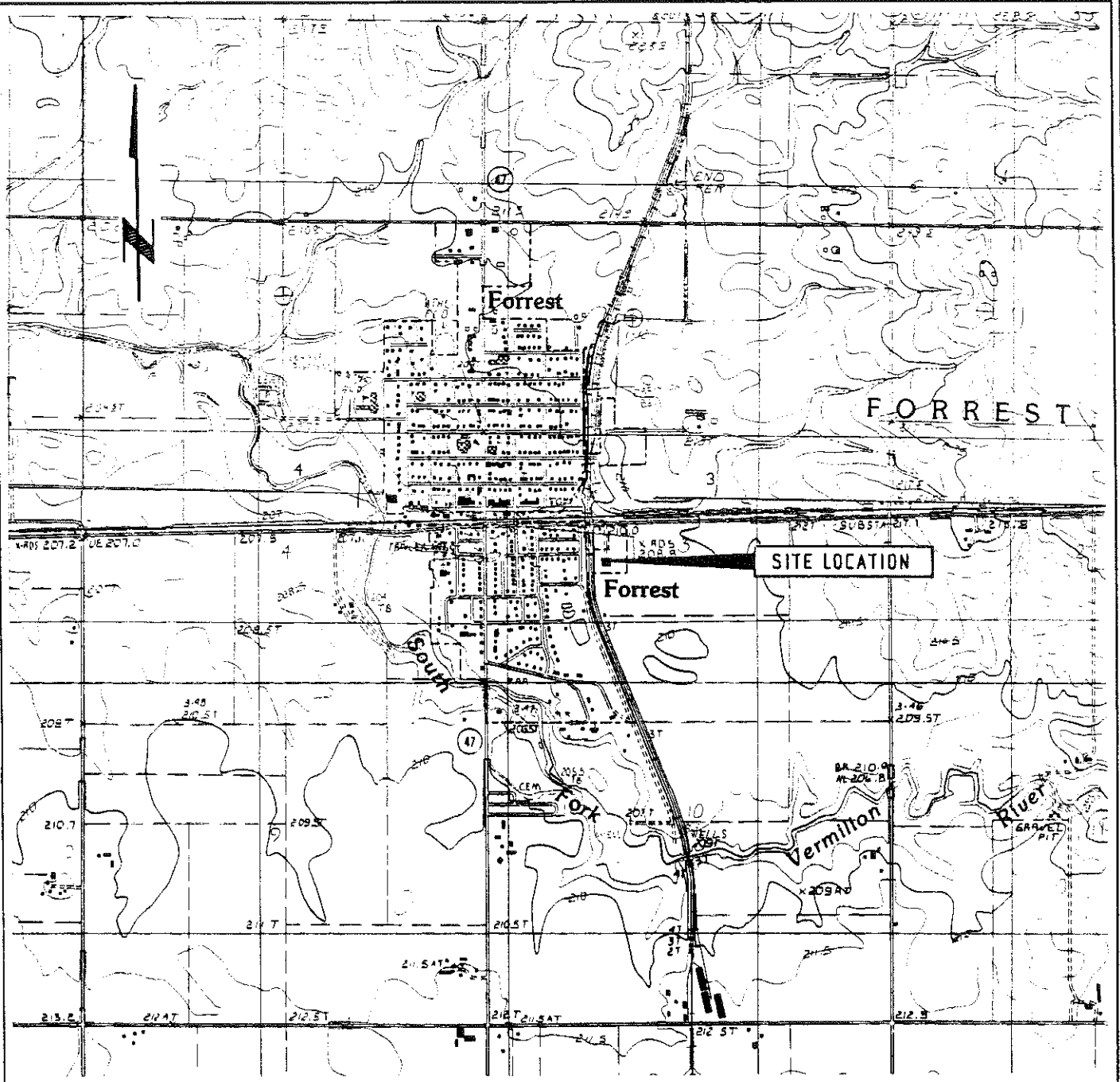
TWN.ldw\_rpt\_SeligClosure\_072093

## USEPA VOLATILE ORGANICS - METHOD 8240

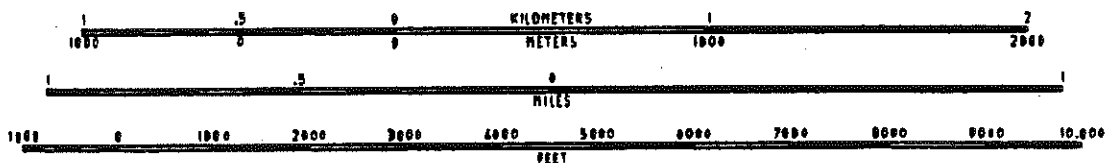
Volatile Organic Parameters	Practical Quantitation Limits Rinsewater (µg/L)	Practical Quantitation Limits Soil (µg/kg)
Chloromethane	10	10
Bromomethane	10	10
Vinyl Chloride	10	10
Chloroethane	10	10
Methylene Chloride	5	5
Acetone	10	10
Carbon Disulfide	5	5
1,1-Dichloroethene	5	5
1,1-Dichloroethane	5	5
1,2-Dichloroethene (total)	5	5
Chloroform	5	5
1,2-dichloroethane	5	5
2-Butanone	10	10
1,1,1-Trichloroethane	5	5
Carbon Tetrachloride	5	5
Vinyl Acetate	10	10
Bromodichloromethane	5	5
1,2-Dichloropropane	5	5
cis-1,3-Dichloropropene	5	5
Trichloroethene	5	5
Dibromochloromethane	5	5
1,1,2-Trichloroethane	5	5
Benzene	5	5
trans-1,3-Dichloropropene	5	5
Bromoform	5	5
4-Methyl-2-Pentanone	10	10
2-Hexanone	10	10
Tetrachloroethene	5	5
1,1,2,2-Tetrachloroethane	5	5
Toluene	5	5
Chlorobenzene	5	5
Ethylbenzene	5	5
Styrene	5	5
Xylene (total)	5	5

## **APPENDIX A**

### **Site Location Map**



SCALE 1:24000



CONTOUR INTERVAL 1.5 METERS

USGS TOPOGRAPHIC MAP - FORREST NORTH, ILLINOIS, AND FORREST SOUTH, ILLINOIS, QUADRANGLES

SITE LOCATION MAP  
SELIG SEALING PRODUCTS, INC.  
FORREST, ILLINOIS



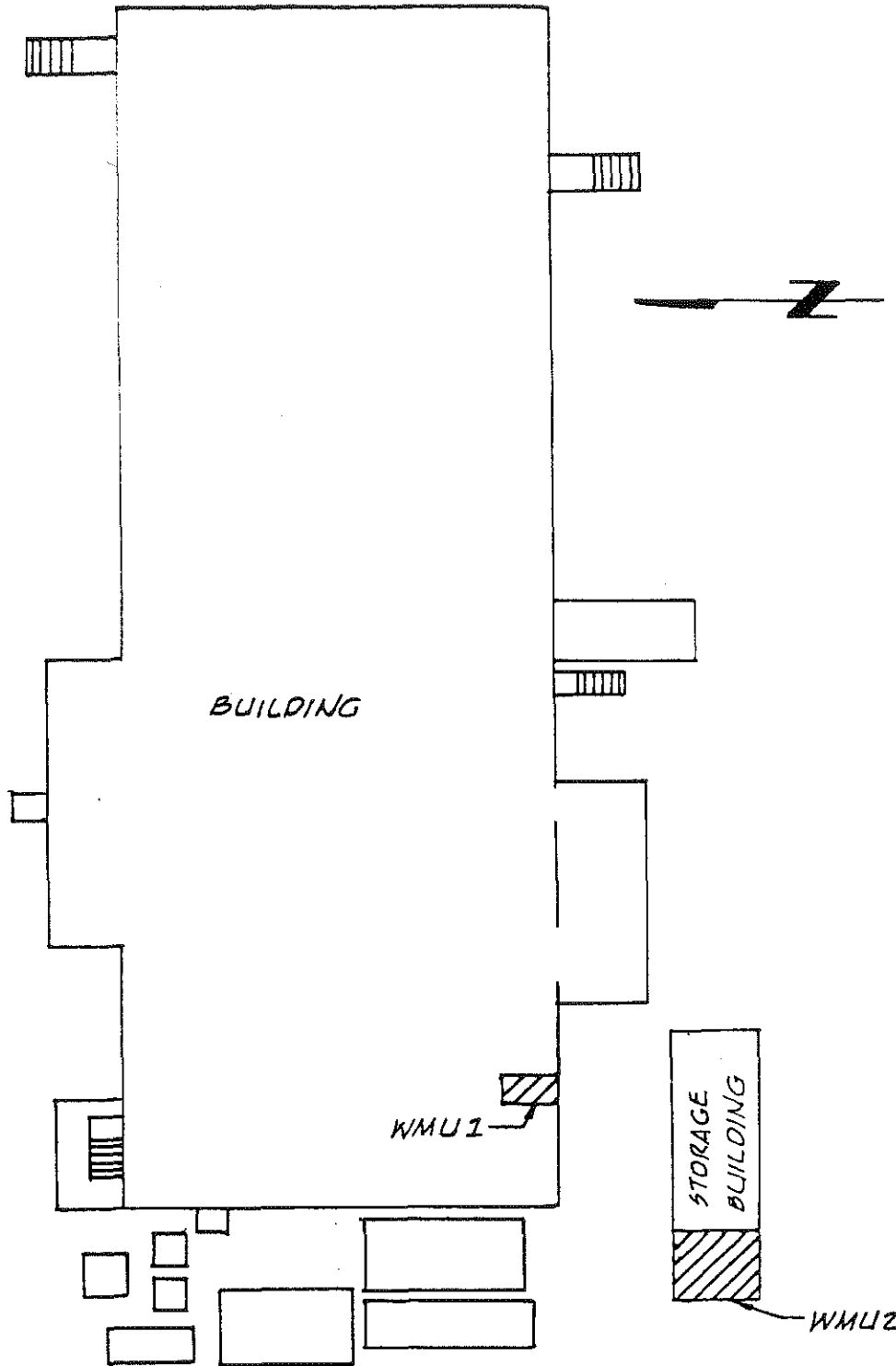
Environmental  
Science &  
Engineering, Inc.

A CILCORP Company

**APPENDIX B**

**Site Map**





SITE MAP  
SELIG SEALING PRODUCTS, INC.  
FORREST, ILLINOIS



Environmental  
Science &  
Engineering, Inc.

**APPENDIX C**

**USEPA Volatile Organics - Method 8240**

## USEPA VOLATILE ORGANICS - METHOD 8240

Volatile Organic Parameters	Practical Quantitation Limits Rinsewater (µg/L)	Practical Quantitation Limits Soil (µg/kg)
Chloromethane	10	10
Bromomethane	10	10
Vinyl Chloride	10	10
Chloroethane	10	10
Methylene Chloride	5	5
Acetone	10	10
Carbon Disulfide	5	5
1,1-Dichloroethene	5	5
1,1-Dichloroethane	5	5
1,2-Dichloroethene (total)	5	5
Chloroform	5	5
1,2-dichloroethane	5	5
2-Butanone	10	10
1,1,1-Trichloroethane	5	5
Carbon Tetrachloride	5	5
Vinyl Acetate	10	10
Bromodichloromethane	5	5
1,2-Dichloropropane	5	5
cis-1,3-Dichloropropene	5	5
Trichloroethene	5	5
Dibromochloromethane	5	5
1,1,2-Trichloroethane	5	5
Benzene	5	5
trans-1,3-Dichloropropene	5	5
Bromoform	5	5
4-Methyl-2-Pentanone	10	10
2-Hexanone	10	10
Tetrachloroethene	5	5
1,1,2,2-Tetrachloroethane	5	5
Toluene	5	5
Chlorobenzene	5	5
Ethylbenzene	5	5
Styrene	5	5
Xylene (total)	5	5

**APPENDIX D**

**Soil Sampling Location Map**

WMU - 2  
Covered Gravel  
Storage Area  
25' X 25'

Storage Building



Selig Sealing Products, Inc.  
Soil Sampling Location Map  
WMU - 2  
Forrest, Illinois



Environmental  
Science &  
Engineering, Inc.



STATE OF ILLINOIS  
ENVIRONMENTAL PROTECTION AGENCY

IL 532-0357  
ADM 39  
054-002

Subject \_\_\_\_\_

Date \_\_\_\_\_

Reviewed by \_\_\_\_\_ Date \_\_\_\_\_

~~① Egin@~~

RE: Selig Sealing Products Closure Plan

WTS,

I'd like for you to review this plan within the next 2 weeks.  
⇒ As such, I'd like to see final draft + review notes by 8/6.

This will will require that you:

- ① get OCS submittal put together early next week
- ② go ahead + get CWS for those compounds of concern + plug them into the letter

we'll just wait on the OCS form to confirm numbers

⇒ I don't have IEPA No. for site

You'll want to make sure you get the files + review them before you get in to this much. I think this is a another one that got caught storing for more than 90 days. As such, you'll want to coordinate your review w/ FDS

- Review using guidance set forth in "Guidance Regarding the Review of Closure Plans."
- Develop good review notes in accordance w/ "Guidance for Review Notes" + guidance I have given you recently on previous projects.

- Computer sheet + cover letter will be coming shortly.
- make sure you complete attached forms + develop parallel document for check list.







1050455002 -- Livingston Co. Selig Sealing Products Inc

**SENDER:**

- Complete items 1 and/or 2 for additional services.
- Complete items 3, and 4a & b.
- Print your name and address on the reverse of this form so that we can return this card to you.
- Attach this form to the front of the mailpiece, or on the back if space does not permit.
- Write "Return Receipt Requested" on the mailpiece below the article number.
- The Return Receipt will show to whom the article was delivered and the date delivered.

I also wish to receive the following services (for an extra fee):

1. ☐ Addressee's Address

2. ☐ Restricted Delivery *NGK*

Consult postmaster for fee. *33*

3. Article Addressed to:

Selig Sealing Products, Inc.  
342 East Wabash  
Forrest, Illinois 61741

4a. Article Number  
*P435 100 712*

4b. Service Type

☐ Registered ☐ Insured

☒ Certified ☐ COD

☐ Express Mail ☐ Return Receipt for Merchandise

7. Date of Delivery  
*7-28-91*

8. Addressee's Address (Only if requested and fee is paid)

5. Signature (Addressee)  
*Melanie Elliott*

6. Signature (Agent)

Is your RETURN ADDRESS completed on the reverse side?

PS Form 3811, December 1991 ☆ U.S.G.P.O.: 1992-307-530

**DOMESTIC RETURN RECEIPT**

*PCRA Closure*

CLOSURE PLAN REVIEW NOTES AND CHECKLIST  
SECTION A: REVIEW NOTES  
(attach notes or references as necessary)

Facility Name: \_\_\_\_\_ Log No.: \_\_\_\_\_

Location (County, Municipality, Township,  
Range, Section): FORREST ILLINOIS

State ID: \_\_\_\_\_ U.S. EPA ID: \_\_\_\_\_

1st Submittal: \_\_\_\_\_ Reviewer: WILLIAM B. WAT Mailed: \_\_\_\_\_

2nd Submittal: \_\_\_\_\_ Reviewer: \_\_\_\_\_ Mailed: \_\_\_\_\_

Regulated Units at the Facility and Their Capacities

Unit	Approved Part A	HWDS	Closure Plan	Units Closing	Units Remaining Open
<u>SO1</u>					
<u>SO1</u>					

\_\_\_\_\_ Partial Closure or X Final (full) Closure  
X Proposed "Clean" Closure or \_\_\_\_\_ "Dirty" Closure

Status of Facility after Closure: LARGE QUANTITY GENERATOR > 1000  $\frac{KG}{Mo.}$

Are any new treatment processes proposed to minimize or render nonhazardous,  
hazardous waste? No Explain: \_\_\_\_\_

Will a change in the Part A be necessary if the closure is approved? No

Is the facility requesting additional time to start or complete closure than allowed? No Explain: ~~Yes~~

Size or area of each unit closing: WMU-1 = 8' x 10'

WMU-2 30' x 30' GRAVEL

Identify wastes managed in each unit (include hazardous waste codes):

HAZARDOUS DUE TO FLASHPOINT < 140°

Volume of wastes disposed of, or located in, units at the facility: \_\_\_\_\_

30,000 # / YEAR

Sampling grid spacing SEE APPENDIX Satisfactory? YES

Total number of samples from unit = 16

Were background samples taken from proper soil horizon? N/A

Total number of background samples (minimum of 10 per strata) = N/A

Submitted to COT on August 1993 (date)

Recommendations from COT dated \_\_\_\_\_

Reviewed by CROPA on \_\_\_\_\_ (date)

CROPA memo dated \_\_\_\_\_

Identify soil and/or groundwater clean-up levels. (Give basis, i.e., closure plan, COT/CROPA recommendation, PQL, etc.):

\_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_

Is the portion of the sample to be tested appropriate? \_\_\_\_\_

Approximate volume of waste to be removed: N/A  
(yds. or gallons)

Approximate volume of underlying and surrounding soil and liner to be removed:

N/A YET

How is site to be capped or otherwise restored? N/A

\_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_

Are there any non-RCRA Solid Waste Management Units? \_\_\_\_\_ Explain: \_\_\_\_\_

\_\_\_\_\_  
\_\_\_\_\_

Have there been any releases from the SWMUs?

Explain: \_\_\_\_\_

\_\_\_\_\_  
How is the groundwater to be addressed for the closing unit? \_\_\_\_\_

Is groundwater monitored? No

Is groundwater contaminated? e.

What is the facility's Subpart F compliance status? OK

If the facility is in assessment, will the assessment be completed prior to final closure? N/A  $\Rightarrow$  THEY ARE NOT IN ASSESSMENT

Is additional groundwater monitoring warranted in closure plan? no

Explain: \_\_\_\_\_

Is groundwater monitoring warranted after closure? \_\_\_\_\_ Explain: \_\_\_\_\_

DON'T KNOW YET

Is the facility being referred to USEPA for corrective action? \_\_\_\_\_

If so, indicate the type of enforcement: 3013 Order \_\_\_\_\_

3008(h) Order \_\_\_\_\_

3005(c) Action \_\_\_\_\_

Final Action: Approve X, Disapprove \_\_\_\_\_, Modify \_\_\_\_\_

Schedule for closure: Date of Plan Approval: \_\_\_\_\_

Start closure: \_\_\_\_\_

Complete closure: \_\_\_\_\_

Certification due to IEPA: \_\_\_\_\_

## SECTION B: CLOSURE PLAN CHECKLIST

### LEGEND

PR: Provided

AD: Adequate

NA: Not Applicable

Note: Respond to questions with  
Y for yes and N for no

### 1. Description of hazardous waste operation and proposed closure (725.212(a) and (b))

PR AD NA

- |   |   |     |  |
|---|---|-----|--|
| Y | Y | —   | a. description provided of hazardous waste operations  |
| Y | Y | —   | b. description provided for all hazardous waste units at the facility                                    |
| Y | Y | —   | c. identification of units closing   |
| N | Y | —   | d. identification of units remaining open  |
| N | N | —   | e. maximum inventory of wastes at any time during life of facility (should correspond to Part A volumes) |
| Y | Y | —   | f. description of steps to be taken for decontamination of facility equipment (725.212(b)(4))            |
| Y | Y | —   | g. expected year of closure for all units at the facility (725.212(b)(1))                                |
| Y | Y | —   | h. schedule of closure for all units (725.212(b)(6) and (b)(7))  |
| — | — | N/A | i. plan submitted 180 days prior to initiation of closure (725.212(d)(1))                                |
| N | N | —   | j. all hazardous wastes and hazardous constituents properly identified                                   |
| N | N | —   | k. groundwater/surface water use in the area identified  |

### 2. Public Involvement (725.212(d)(4))

- |   |   |     |  |
|---|---|-----|--|
| — | — | —   | a. newspaper notice posted                           |
| — | — | N/A | b. public hearing requested?                         |
| — | — | N/A | c. public hearing granted?                           |
| — | — | N/A | d. notice of public hearing 30 days prior to hearing |

### 3. Closure time limits (725.213)

- |   |   |     |  |
|---|---|-----|--|
| N | N | —   | a. 90-day limit for treatment, removal or disposal of hazardous wastes |
| Y | Y | —   | b. 180-day limit for completion of closure activities                  |
| — | — | N/A | c. extension of time limits  |
| — | — | N/A | d. justification provided for extension of time limits?                |



4. Disposal or decontamination of equipment (725.214)

PR AD NA

- |                                     |                                     |                          |    |  |
|-------------------------------------|-------------------------------------|--------------------------|----|--|
| <input checked="" type="checkbox"/> | <input checked="" type="checkbox"/> | <input type="checkbox"/> | a. | proper disposal of facility equipment and structures, or               |
| <input checked="" type="checkbox"/> | <input checked="" type="checkbox"/> | <input type="checkbox"/> | b. | decontamination - removal of all hazardous wastes and residues         |
| <input checked="" type="checkbox"/> | <input checked="" type="checkbox"/> | <input type="checkbox"/> | c. | decontamination of equipment used for cleanup                          |
| <input checked="" type="checkbox"/> | <input checked="" type="checkbox"/> | <input type="checkbox"/> | d. | decontamination method   |
| <input checked="" type="checkbox"/> | <input checked="" type="checkbox"/> | <input type="checkbox"/> | e. | RCRA wastes and residues to be handled and disposed as hazardous waste |

5. Certification of closure (725.215, 725.216 and 725.219)

- |                                     |                                     |                          |    |   |
|-------------------------------------|-------------------------------------|--------------------------|----|---|
| <input checked="" type="checkbox"/> | <input checked="" type="checkbox"/> | <input type="checkbox"/> | a. | provision for certification by owner or operator within 60 days following closure   |
| <input checked="" type="checkbox"/> | <input checked="" type="checkbox"/> | <input type="checkbox"/> | b. | provision for certification by independent registered Professional Engineer that facility was closed in accordance with the approved closure plan |
| <input checked="" type="checkbox"/> | <input checked="" type="checkbox"/> | <input type="checkbox"/> | c. | provision for Closure Documentation Report to document closure activities   |
| <input type="checkbox"/>            | <input type="checkbox"/>            | <u>N/A</u>               | d. | survey plat and notification in deed to Agency and appropriate local government office  |
| <input type="checkbox"/>            | <input type="checkbox"/>            | <u>N/A</u>               | e. | certification to Agency that notification in deed has been made (725.219(b)(2))   |

6. Post-Closure Care Plan required? (725.217)

- |                          |                          |            |  |
|--------------------------|--------------------------|------------|--|
| <input type="checkbox"/> | <input type="checkbox"/> | <u>N/A</u> | Disposal units closing after 1/26/83 are required to obtain a Post-Closure Permit.<br>Advise facility that a PCC Plan will be called in at a later date. |
|--------------------------|--------------------------|------------|--|

7. Closure of container storage area (S01).

- |                                     |                                     |                          |    |  |
|-------------------------------------|-------------------------------------|--------------------------|----|--|
| <input checked="" type="checkbox"/> | <input checked="" type="checkbox"/> | <input type="checkbox"/> | a. | soil sampling plan   |
| <input checked="" type="checkbox"/> | <input checked="" type="checkbox"/> | <input type="checkbox"/> |    | grid spacing   |
| <input checked="" type="checkbox"/> | <input checked="" type="checkbox"/> | <input type="checkbox"/> |    | adjacent areas to be sampled for spills and/or windblown particulates                      |
| <input checked="" type="checkbox"/> | <input checked="" type="checkbox"/> | <input type="checkbox"/> | b. | soil analysis plan   |
| <input checked="" type="checkbox"/> | <input checked="" type="checkbox"/> | <input type="checkbox"/> |    | includes all hazardous constituents  |
| <input checked="" type="checkbox"/> | <input checked="" type="checkbox"/> | <input type="checkbox"/> |    | detection limits   |
| <input checked="" type="checkbox"/> | <input checked="" type="checkbox"/> | <input type="checkbox"/> |    | sampling increments and total depth of sampling  |
| <input checked="" type="checkbox"/> | <input checked="" type="checkbox"/> | <input type="checkbox"/> |    | sample handling and analysis (40 CFR 261, App. III; SW-846; Attachment 7 of this document) |
| <input checked="" type="checkbox"/> | <input checked="" type="checkbox"/> | <input type="checkbox"/> | c. | removal of contaminated soil   |
| <input checked="" type="checkbox"/> | <input checked="" type="checkbox"/> | <input type="checkbox"/> | d. | cleanup standard   |
| <input checked="" type="checkbox"/> | <input checked="" type="checkbox"/> | <input type="checkbox"/> | e. | post-closure care in lieu of clean closure   |
| <input checked="" type="checkbox"/> | <input checked="" type="checkbox"/> | <input type="checkbox"/> | f. | decontamination of facility  |
| <input checked="" type="checkbox"/> | <input checked="" type="checkbox"/> | <input type="checkbox"/> | g. | decontamination of equipment   |
| <input checked="" type="checkbox"/> | <input checked="" type="checkbox"/> | <input type="checkbox"/> | h. | disposal of cleaning waste and residue   |

PR AD NA

- |          |          |   |    |   |
|----------|----------|---|----|---|
| <u>Y</u> | <u>Y</u> | — | i. | scale drawing of storage area   |
| <u>Y</u> | <u>Y</u> | — | j. | surface description (asphalt, concrete, aggregate, soil)                                  |
| <u>Y</u> | <u>Y</u> | — | k. | structural integrity and containment devices (cracks, joints, deterioration, curbs, roof) |

8. Closure of tank storage or treatment units (S02, T01 -- 725.297)

N/A  
(2)  
S01  
UNITS  
ONLY

- |   |   |   |    |   |
|---|---|---|----|---|
| — | — | — | a. | scale drawing of storage area, including secondary containment structures, sumps and drainage pathways                                  |
| — | — | — | b. | description of materials used to construct tanks, ancillary equipment and secondary containment structures                              |
| — | — | — | c. | present condition of tanks, ancillary equipment and secondary containment structures (i.e., structural integrity and surface condition) |
| — | — | — | d. | removal of all hazardous wastes and residues from:  |
| — | — | — |    | tanks   |
| — | — | — |    | pipes and discharge control equipment   |
| — | — | — |    | discharge confinement structures  |
| — | — | — | e. | decontamination of equipment  |
| — | — | — | f. | soil testing beneath and around tank, including secondary containment areas, to verify that no spills or leaks have occurred            |
| — | — | — |    | includes all hazardous constituents   |
| — | — | — |    | detection limits  |
| — | — | — |    | sampling increments and total depth of sampling   |
| — | — | — |    | sample handling and analysis (40 CFR 261, App. III; SW-846; Attachment 7 of this document)  |
| — | — | — | g. | cleanup standard  |
| — | — | — | h. | removal of contaminated soil  |
| — | — | — | i. | removal of tank (required by State Fire Marshall for underground tanks which contained flammable materials)                             |

9. Closure and post-closure for surface impoundments (S04, D83, T02 - 725.328)

N/A  
(2)  
(S01)  
UNITS  
ONLY

- |   |   |   |    |   |
|---|---|---|----|---|
| — | — | — | a. | removal of standing liquids   |
| — | — | — | b. | removal of wastes and waste residues  |
| — | — | — | c. | removal of liner  |
| — | — | — | d. | removal of underlying and surrounding contaminated soil   |
| — | — | — | e. | cleanup standard  |
| — | — | — | f. | management of removed material as hazardous waste unless determined to be nonhazardous under 721.103(c)   |
| — | — | — | g. | post-closure care in lieu of material removal (725.328(c)) (40 CFR 265.228(a)(2), March 19, 1987)   |
| — | — | — | h. | dewatering, stabilization or other treatment of remaining wastes to provide cover support and/or render waste nonhazardous (40 CFR 265.228(a)(2), March 19, 1987) |
| — | — | — | i. | request for modification of Part A to include T02 if stabilization or treatment is proposed   |

PR AD NA

N/A 2 (501) UNITS ONLY	—	—	—	j.	modification of post-closure requirements due to mitigating factors (725.217(d))
	—	—	—	k.	soil sampling plan grid spacing adjacent areas to be sampled for spills and/or windblown particulates
	—	—	—	l.	soil analysis plan includes all hazardous constituents detection limits sample handling and analysis (40 CFR 261, App. III; SW-846; Attachment 7 of this document)
	—	—	—	m.	groundwater monitoring provided to verify clean closure (724 or 725, Subpart F)

10. Closure and post-closure of waste piles (S03 725.358)

N/A 2 (501) UNITS ONLY	—	—	—	a.	removal or decontamination of all waste residues
	—	—	—	b.	removal or decontamination of contaminated: liners subsoils structures and equipment (contaminated with leachate or waste)
	—	—	—	c.	management of removed materials as hazardous waste unless determined to be nonhazardous according to 721.103(c) & (d)
	—	—	—	d.	post-closure care provided in accordance with 725.410 if all contaminated subsoils can't be removed or decontaminated
	—	—	—	e.	soil sampling plan grid spacing adjacent areas to be sampled for spills, tracking and/or windblown particulates
	—	—	—	f.	soil analysis plan includes all hazardous constituents detection limits sampling increments and total depth of sampling sample handling and analysis (40 CFR 261, App. III; SW-846; Appendix 7 of this document)
	—	—	—		
	—	—	—		

11. Closure and post-closure care objectives for land treatment (D81 725.380(a))

N/A 2 (501) UNITS ONLY	—	—	—	a.	control mitigation of hazardous wastes and hazardous waste constituents into the groundwater
	—	—	—	b.	control release of contaminated run-off into surface water
	—	—	—	c.	control release of airborne particulate contaminants
	—	—	—	d.	compliance with food chain crop requirements (725.376)

12. Considerations to be addressed in land treatment closure and post-closure plans (725.380(b))

PR	AD	NA	
—	—	—	a. type and amount of hazardous wastes and Appendix H hazardous constituents which are contained in the waste
—	—	—	b. mobility of hazardous wastes and constituents
—	—	—	c. site location, topography and surrounding land use and the related potential effects of pollutant migration
—	—	—	d. climate (net precipitation)
—	—	—	e. soil profile and soil properties
—	—	—	f. geologic profile
—	—	—	g. surface and subsurface hydrology
—	—	—	h. unsaturated zone monitoring information (725.378)
—	—	—	i. type, concentration and depth of hazardous waste migration
—	—	—	j. removal of contaminated soils
—	—	—	k. cleanup standards
—	—	—	l. function of final cover
—	—	—	m. engineering characteristics of final cover
—	—	—	n. groundwater monitoring

13. Requirements during land treatment closure period (725.380(d))

—	—	—	a. unsaturated zone monitoring
—	—	—	b. maintain run-on control system (725.372(b))
—	—	—	c. maintain run-off control system (725.372(c))
—	—	—	d. control wind dispersal of particulates

14. Certification by qualified soil scientist in lieu of a registered Professional Engineer for closure of land treatment units (725.380(e))

15. Closure of incinerators (T03)

—	—	—	a. removal of all hazardous wastes and hazardous waste residues, including ash, scrubber waters and scrubber sludges
—	—	—	b. management of residues as hazardous wastes unless determined to be nonhazardous according to 721.103(c) & (d)

16. Closure of thermal treatment units (725.481)

—	—	—	a. removal of hazardous waste and hazardous waste residues, including ash
—	—	—	b. management of residues as hazardous waste unless determined to be nonhazardous according to 725.103(c) & (d)

17. Closure of chemical, physical and biological treatment units (725.504)

—	—	—	a. removal of all hazardous wastes and hazardous waste residues from treatment process or equipment, discharge control equipment and discharge confinement structures
---	---	---	---

N/A PR AD NA

2 } — — — b. management of residues as a hazardous waste unless determined  
SOI to be nonhazardous according to 721.103(c) & (d)  
UNITS  
ONLY

# ALL DISPOSAL UNITS

N/A { 18. Objective of closure and post-closure plans (725.410(b))  
2 } — — — a. control of pollutant migration from facility via groundwater,  
(SOI) } — — — b. control of ponding and surface water infiltration  
UNITS } — — — c. erosion, run-on and run-off control  
ONLY }

## 19. Considerations for achievement of closure objectives (725.410(c))

N/A { — — — a. type and amount of hazardous wastes and Appendix H hazardous  
(2) } — — — b. mobility and the expected rate of migration of pollutants  
(SOI) } — — — c. site location, topography and surrounding land use and the  
UNITS } — — — d. related potential effects of pollutant migration (proximity  
ONLY } — — — e. to groundwater, surface water and drinking water)  
— — — f. climate, including total amount, net amount, frequency and pH  
— — — g. of rainfall  
— — — h. engineering characteristics of cover, including material,  
— — — final surface contours, thickness, porosity, slope and length  
— — — of run of slope  
— — — f. geological and soil profiles  
— — — g. surface and subsurface hydrology  
— — — h. soil balance analysis if on-site soils are to be used for  
cover and vegetative layer

## 20. Cover design (725.410(a))

N/A { — — — a. grain size analysis and grain size requirements  
(2) } — — — b. soil classification -- USDA textural and Unified Soil  
(SOI) } — — — c. Classification  
UNITS } — — — d. compaction requirements -- should be 90-95% of ASTM D698  
ONLY } — — — e. (Standard Proctor) density, compacted at a moisture content  
— — — f. 3-5% above optimum moisture content  
— — — g. type of vegetation proposed  
— — — h. hydraulic conductivity  
— — — i. slope stability analysis  
— — — j. synthetic membrane specifications  
— — — k. depth of frost penetration and its effect on the cover system  
— — — l. erosion control  
— — — m. gas collection system  
— — — n. water balance analysis to estimate infiltration  
— — — o. settlement/subsidence effects considered

21. Construction procedures for cover (725.410(a))

	PR	AD	NA	
N/A (2) (501) UNITS ONLY	—	—	—	a. equipment requirements -- sheepsfoot roller, disk and water truck or other provisions for moisture control
	—	—	—	b. lift thickness -- should be 8 inches (loose thickness) or less
	—	—	—	c. construction QA/QC -- number of compaction tests, hydraulic conductivity tests, grain size tests, etc.
	—	—	—	d. hydraulic conductivity testing conducted in accordance with IEPA guidance

22. Notice to local land authority (725.216 and 725.219)

	PR	AD	NA	
N/A (2) (501) UNITS ONLY	—	—	—	a. survey plat submitted to the Agency and to County Recorder with closure certification
	—	—	—	b. note on plat which states owner's and operator's obligation to restrict disturbance of the site per 725.217(c)
	—	—	—	c. record provided of type, location and quantity of hazardous waste disposed of within each cell or area of the facility, including wastes disposed prior to January 12, 1981 (725.219(a))

23. Notice in deed to property (725.219)

	PR	AD	NA	
N/A (2) (501) UNITS ONLY	—	—	—	a. recorded on deed or other instrument which will be examined during a title search that the land has been used to manage hazardous waste
	—	—	—	b. copy of this instrument and a certification from the owner/operator that it has been properly recorded

24. Maintenance requirements -- activities and frequencies (725.217(a); 725.218(c); 725.410(d))

	PR	AD	NA	
N/A (2) (501) UNITS ONLY	—	—	—	a. integrity of final cover or containment structures
	—	—	—	b. leachate collection, removal and treatment systems
	—	—	—	c. groundwater monitoring system
	—	—	—	d. gas collection and control system (if provided)
	—	—	—	e. benchmarks
	—	—	—	f. name, address and phone number for post-closure care contact person (725.218(c)(3))

25. Security

	PR	AD	NA	
N/A (2) (501) UNITS ONLY	—	—	—	a. restricted access, if necessary
	—	—	—	b. security provided, if necessary (725.217(b))

26. Groundwater monitoring (725.217(a)(1); 725.218(a)(1); 725.191 to 725.193)

N/A (2) (501) UNITS ONLY	PR	AD	NA	
	—	—	—	a. description of groundwater monitoring system, activities and frequencies for post-closure period (725.191; 725.218(a)(1))
	—	—	—	b. sampling and analysis plan (725.192)
	—	—	—	c. outline of groundwater quality assessment program (725.193)

ALL FACILITIES

N/A (2) (501) UNITS ONLY	27. Closure performance standard (725.211)			
	Y	Y	—	a. minimizes further maintenance
	Y	Y	—	b. protects human health and environment
	Y	Y	—	c. addresses all hazardous constituents (Part 721, Appendix H)

28. Training requirements for cleanup activities

P6-1	Y	Y	—	a. provisions made to ensure that site workers will receive training in accordance with 29 CFR, Part 1910
------	---	---	---	---

29. Part A Status

{	—	—	—	a. Part A and HWDMS reviewed
	—	—	—	b. discrepancies between units and design capacities in Part A, HWDMS and closure plan resolved
	—	—	—	c. for complete closure -- all units closed or withdrawn
	—	—	—	d. revised Part A or withdrawal request to be submitted with closure certification

30. SWMU status

{	—	—	—	a. initial screening completed
	—	—	—	b. initial screening previously submitted
	—	—	—	c. environmentally significant information found during file search
	—	—	—	d. Certification of Continuing Releases received from facility
	—	—	—	e. units identified by facility consistent with those found during file search
	—	—	—	f. releases indicated on certification
	—	—	—	g. releases to be cleaned up under closure
	—	—	—	h. releases to be referred to US EPA for action
	—	—	—	i. SWMU's not previously identified discovered during closure?

<u>Date</u>	<u>Person Contacted</u>	<u>Topic of Conversation</u>
-------------	-------------------------	------------------------------

Topic of Conversation

3-13





Due 8/23/93mm

CLOSURE LOG # : 710  
FACILITY : SELIG SEALING PRODUCTS INC  
STATE ID # : 1050455002  
FED ID # : ILD066197195  
STATUS : A  
TYPE :  
NOTIFY RPMS : Y

LOCATION : FORREST  
COUNTY : LIVINGSTON  
REVIEWER : WTS  
GAU REVIEWER :  
NOTIFY FOS : Y  
NOTIFY CMS : Y  
FH :  
INSP :

1st-RECD : 93/07/23  
90-DUE : 93/10/21  
1-MAILED :  
APP or REJ :

2nd-SCHED :  
2nd-RFCD :  
60-DUE :  
2-MAILED :

CERTIFICATION DUE :  
CLOSED :  
UNITS CLOSED :  
UNITS REMAIN :  
G OR T STATUS:  
COMMENTS :

CERTIFICATION RECD :  
CLEAN CLOSURE :  
CTL SENT :  
PECI SENT :

**RECEIVED**

**AUG 20 1993**

CONTAM SOIL-Y/N/? : ABOVE PQL-Y/N/? : ABOVE CUO-Y/N/? : IEPA - BOL  
CONTAM-VO/SVO/M/? : PERMIT SECTION  
CONTAM GW-Y/N/? : ABOVE PQL-Y/N/? : ABOVE CUO-Y/N/? :  
CONTAM-VO/SVO/M/? :

REMEDICATION-PROP/IN PROG/COMPLETE/NA: VOLUME: UNIT-T/CY:

SOIL VENT-Y/N: AERATE-Y/N/ON/OFF: STABILIZE-Y/N/ON/OFF:  
CAP IN PLACE-Y/N: BIOREM-Y/N: INCIN-Y/N/ON/OFF:  
LANDFILL-Y/N/ON/OFF: TREATMENT-Y/N/ON/OFF: PUMP & TREAT GW-Y/N:

PROCESS 1:	AMOUNT 1:	UNIT1:	ADD/DEL :
PROCESS 2:	AMOUNT 2:	UNIT2:	ADD/DEL :
PROCESS 3:	AMOUNT 3:	UNIT3:	ADD/DEL :
PROCESS 4:	AMOUNT 4:	UNIT4:	ADD/DEL :
PROCESS 5:	AMOUNT 5:	UNIT5:	ADD/DEL :
PROCESS 6:	AMOUNT 6:	UNIT6:	ADD/DEL :

- 1) COMPLETE CLOSURE CHECKLIST
- 2) CALL FOS & MAKE SURE THESE ARE CORRECT AREAS TO CLOSE
- 3) STORAGE AREA INTEGRITY (CRACKS. GAPS. JOINTS. CURBS. ETC.)
- 4) STORAGE AREA RUNOFF/DRAINAGE
- 5) SAMPLING PARAMETERS W.R.T. WASTES MANAGED
- 6) SAMPLING METHODS AND LOCATIONS AND DEPTHS
- 7) ANALYTICAL METHODS (SW-846)
- 8) REVIEW NOTES
  - a. Intro to Project -- Site name, location, brief description of submitt
  - b. Pertinent Site History
  - c. Summary/Review/Evaluation of Submittal
  - d. Identification of Final Action to be Taken
  - e. Discussion of Final Action, Including Discussion of Final Letter
- 9) COMPUTER BLANKS

# COMPLIANCE UNIT EVALUATION

THERE ARE NO OUTSTANDING RCRA VIOLATIONS. \_\_\_\_\_

THERE ARE NO OUTSTANDING SOLID WASTE VIOLATIONS ON THE COMPLIANCE UNIT'S TRACKING SYSTEM.\* \_\_\_\_\_

OUTSTANDING RCRA VIOLATIONS.   X  

OUTSTANDING SOLID WASTE VIOLATIONS.\* \_\_\_\_\_

VIOLATION	EVALUATION DATE	REVIEWER	CIL DATE	PECL DATE	AWN DATE	EDG DATE
703.121(A)	3-4-93	DEBORAH PAXTON		5-10-93		
703.121(B)						
703.150(A)						
722.111						
725.114(A)/(B)						
725.115(B)						
725.115(D)						
725.132						
725.133						
725.137						
725.151(A)						
725.155						
725.173						
725.242(A)						
725.274						
728.107(A)	8-19-93	V. 11/11/93				
725.243						
725.242						
CURC'S INITIALS	AB					

DATE

8-19-93

COMMENTS:

\*THE COMPLIANCE UNIT HAS BEEN TRACKING SOLID WASTE VIOLATIONS SINCE MARCH 1, 1991. PLEASE CONTACT FOS FOR SOLID WASTE VIOLATIONS PRIOR TO THIS DATE.

93021

CERTIFICATION RECD " "  
CLEAN CLOSURE " "  
CIL SENT " "  
PECL SENT " "

ABOVE CUO-Y/H/? :

CERTIFICATION RECD :  
CLEAN CLOSURE :  
CIL SENT :  
PECL SENT :

ABOVE CUD--Y/N/? :

VOLUME : UNIT-T/CY :



STATE OF ILLINOIS  
ENVIRONMENTAL PROTECTION AGENCY

IL 532-0357  
ADM 39  
054-002

1 of 5

Subject SELIG SEALING PRODUCTS,

Data \_\_\_\_\_

Reviewed by WILLIAM T SINNOTT II

September 8  
August 8, 1993

INTRODUCTION TO PROJECT

SUBMITTAL By NAME: SELIG SEALING PRODUCTS

DATE of SUBMITTAL

SELIG SEALING PRODUCTS: JULY 22, 1993

RECEIVED DATE: JULY 23, 1993

NAME of FACILITY: SELIG SEALING PRODUCTS

FACILITY LOCATION: 342 E. WABASH  
P.O. Box 37

FORREST, IL 61741

SUBMITTED By: ENVIRONMENTAL SCIENCE & ENGINEERING

WHY SENT IN: VIOLATION of 90 Day Limit.

- 1) IS IT A FIRST SUBMITTAL: YES
- 2) IS IT A MODIFICATION TO A PREVIOUS SUBMITTAL: No
- 3) WHAT HWMU'S ARE BEING ADDRESSED: 2(SOI) UNITS

STATE OF ILLINOIS  
ENVIRONMENTAL PROTECTION AGENCY

IL 532-0357  
ADM 39  
054-0D2

2 of 5

Subject SELIG SEALING PRODUCTS

Date RCRA CLOSURE

Reviewed by WILLIAM T SINNOTT II

Date SEPTEMBER 8, 1993

PERTINENT SITE HISTORY

THE FACILITY VIOLATED THE 90 DAY STORAGE LIMIT, HENCE;  
THEY WROTE A CLOSURE PLAN.

STATE OF ILLINOIS  
ENVIRONMENTAL PROTECTION AGENCY

IL 532-0357  
ADM 39  
054-002

3 of 5

Subject SELIG SEALING PRODUCTS

Data RCRA CLOSURE PLAN

Reviewed by WILLIAM T SINNOTT II

Date SEPTEMBER 8, 1993

FINAL ACTION TO BE TAKEN

I BELIEVE WE SHOULD APPROVE THIS PLAN.



Subject SEIG SEALING PRODUCTS  
Data RCEA CLOSURE  
Reviewed by WILLIAM J. S. NOTT II

Date SEPTEMBER 8, 1993

DISCUSSION OF FINAL ACTION

- ① CLOSURE ACTIVITIES DONE BY 3/15/94 &  
CERTIFICATION BY 5/15/94
- ② SECTION 40 OF THE ILLINOIS ENVIRONMENTAL  
PROTECTION ACT.
- ③ CONTAMINATION TELL US W/IN 15 DAYS
- ④ HAZ WOPER
- ⑤ CONCRETE STEAM CLEAN, TRIPLE RINSE & INSPECT FOR  
CRACKS
- ⑥ JOINTS OR CRACKS TAKE SOIL SAMPLES
- ⑦ USE 82% OF SW-846
- ⑧ CLEAN-UP-OBJECTIVES
- ⑨ ~~FOR~~ WHAT TO DO IF FIND SOMETHING NOT IN CUO'S
- ⑩ DETERMINE  $A_2$  & VT EXTENT OF CONTAMINATION
- ⑪ PER SW846
- ⑫ STEAM CLEAN & TRIPLE RINSE EVERYTHING
- ⑬ CONTAMINATED SOIL MAY BE SHIPPED OFF SITE AT  
ANY TIME
- ⑭ HOW TO DO SOIL EXCAVATION

STATE OF ILLINOIS  
ENVIRONMENTAL PROTECTION AGENCY

IL 532-0357  
ADM 39  
054-002

5 of 5

Subject SEALING PRODUCTS

Date ECRA

Reviewed by WILLIAM T SINNOTT II

Date SEPTEMBER 8, 1993

- (15) REMOVE CONTAMINATED SOIL DOWN TO CUO'S
- (16) NOT REMOVE CONTAMINATED SOIL  $\Rightarrow$  TELL US WHAT YOUR PLAN IS
- (17) SOIL CONTAMINATION DOWN TO GROUNDWATER (G.W.)
- (18) GW IS ENCOUNTERED BEFORE CLEANUP IS FINISHED
- (19) POST CLOSURE IN LIEU OF CLEAN CLOSURE
- (20) DON'T MAKE A WASTE PILE
- (21) RESPONSIBLE PARTY TRANSFER ACT.
- (22) FACILITY REPORTING UNIT



Subject SELIG SEALING PRODUCTS INC.

Data \_\_\_\_\_

Reviewed by WILLIAM T SINNOTT II Date JULY 26, 1993

CLOSURE PLAN CHECKLIST

1. DESCRIPTION of HAZARDOUS WASTE OPERATION & PROPOSED CLOSURE

- Y) Y) a. PROVIDED ON P 3-1 of THE SUBMITTAL.
- Y) Y) b. PROVIDED ON P 4-1 of THE SUBMITTAL
- Y) Y) c. PROVIDED ON P 4-1 of THE SUBMITTAL
- N) Y) d. IN THE SUBMITTAL THEY SAY THEY WILL GO BACK TO BRING A LARGE QUANTITY GENERATOR ONLY.
- N) N) e. THEY DID NOT PROVIDE THIS INFORMATION, HOWEVER ITS NOT A BIG DEAL
- Y) Y) f) PROVIDED ON P 5-1 of THE SUBMITTAL
- Y) Y) g) PROVIDED ON P 7-1 of THE SUBMITTAL
- Y) Y) h) PROVIDED ON P 7-1 of THE SUBMITTAL.
- N/A i)
- N) N) j) I SPOKE W/ TED NEHKORN of E.S.E. SAID THEY ALSO HAD M.E.K. AND ISOBUTY ALCOHOL.
- N) N) k) THIS IS NOT PROVIDED IN THE SUBMITTAL; HOWEVER, IT'S NOT A MAJOR CONCERN AT THIS POINT IN TIME.

STATE OF ILLINOIS  
ENVIRONMENTAL PROTECTION AGENCY

IL 532-0357  
ADM 39  
054-002

Subject SEI SEALING PRODUCTS, INC.

Data \_\_\_\_\_

Reviewed by WILLIAM T. S. WOOTTE II

Date JULY 26, 1993

3. CLOSURE TIME LIMITS

N) N a.) THEY DON'T MENTION THE 90 DAY LIMIT.  
BUT WE WILL PUT THIS IN CLOSURE PLAN  
APPROVAL LETTER.

Y Y b.) THIS IS COVERED ON P 7-1 OF THE SUBMITTAL.

N/A c.)  
N/A d.)

4. DISPOSAL OR DECONTAMINATION OF EQUIPMENT

Y) Y a-e COVERED ON PP 5-1 and 5-2.

5. CERTIFICATION OF CLOSURE

Y) Y a.) PROVIDED ON PAGES 7-1 & 8-1.

Y) Y b.) PROVIDED ON PP 7-1 & 8-1.

Y) Y c.) PROVIDED ON PP 7-1 & 8-1.

6. CLOSURE OF CONTAINER STORAGE AREA (SOV)

Y) Y a.) 1) SEE APPENDIX D

Y) Y 2) SEE APPENDIX D

(Y) b) 1-4 SEE P 5-1

Y) Y c.) SEE P 5-2

Y) Y d.) SEE P 1-1

STATE OF ILLINOIS  
ENVIRONMENTAL PROTECTION AGENCY

IL 532-0357  
ADM 39  
054-002

3 of 3

Subject SELC SEALING PRODUCTS, INC.

Data RCAH CLOSURE

Reviewed by WILLIAM T SINNOTT

Date JULY 26, 1993

6) CLOSURE of CONTAINER STORAGE AREA (SOI) (CONTINUED)

N)N(e) POST CLOSURE CARE IS NOT MENTIONED

Y)Y f)-h) COVERED ON PP5-1 & 5-2 of THE SUBMITTAL

Y)Y i) SEE APPENDIX D

Y)Y j)-k) SEE P 4-1 of THE SUBMITTAL



STATE OF ILLINOIS  
ENVIRONMENTAL PROTECTION AGENCY

IL 532-0357  
ADM 39  
D54-002

Subject SELIG SEALING PRODUCTS, INC.  
Data RCRA CLOSURE  
Reviewed by WILLIAM T. SINNOTT II

Date JULY 23, 1993

INTRODUCTION TO PROJECT

SUBMITTAL BY NAME : SELIG SEALING PRODUCTS, INC.  
DATE OF SUBMITTAL : JULY 21, 1993  
RECEIVED DATE : JULY 23, 1993  
FACILITY LOCATION : 342 E. WABASH  
P.O. BOX 37  
FOREST, ILLINOIS 61741  
FACILITY NAME : SELIG SEALING PRODUCTS INC.  
WHY WAS SUBMITTAL SENT IN: THE FACILITY WAS IN VIOLATION  
FOR STORING HAZ. WASTE 90  
DAYS.

- 1) IS IT A FIRST SUBMITTAL? : YES
- 2) IS IT A MODIFICATION TO A PREVIOUS SUBMITTAL: NO
- 3) WHAT HWMU'S ARE BEING ADDRESSED BY THIS CLOSURE PLAN: 250



STATE OF ILLINOIS  
ENVIRONMENTAL PROTECTION AGENCY

IL 532-0357  
ADM 39  
054-002

20f

Subject SELIG SEALING PRODUCTS, INC.

Date RCEP CLOSURE

Reviewed by WILLIAM T SINNOTT II

Date JULY 23, 1993

REVIEW of FILES / PERTINENT SITE HISTORY

WERE IN VIOLATION of THE 90  
DAY STORAGE LIMIT.

3 of

STATE OF ILLINOIS  
ENVIRONMENTAL PROTECTION AGENCY

IL 532-D357  
ADM 39  
D54-002

Subject SELIG SEALING PRODUCTS

Data RCRA CLOSURE

Reviewed by WILLIAM T SINNOTT II

Date July 23, 1993

REVIEW of FILES / PERTINENT SITE HISTORY

STATE OF ILLINOIS  
ENVIRONMENTAL PROTECTION AGENCY

IL 532-0357  
ADM 39  
D54-002

4 of

Subject SELIG SEALING PRODUCTS, INC.

Data RCRA CLOSURE

Reviewed by WILLIAM T. SINNOTT II

Date JULY 23, 1993

FINAL ACTION TO BE TAKEN

I BELIEVE THAT WE SHOULD APPROVE THIS CLOSURE  
PLAN.

Subject

SEALING PRODUCTS

Date

RCRA CLOSURE

Reviewed by

William T. SNOW II

Date

July 23, 1993

DISCUSSION OF FINAL ACTION TO BE TAKEN

1. Closure done by 3/5/94 & CERT by 5/15/94
2. SECTION 40 OF THE ILLINOIS ENVIRONMENTAL Protection Act.
3. TELL US ABOUT CONTAMINATION W/I.N (15) DAYS
4. HAZWOPER
5. STEAM CLEAN & TRIPLE RINSE CONCRETE  $\Rightarrow$  INSPECT FOR CRACKS
6. CRACKS OR JOINTS  $\Rightarrow$  SOIL SAMPLE.
7. ANALYZE FOR 8270
- ⑧ CLEAN-UP - OBJECTIVES
- ⑨ FIND SOMETHING NOT IN CUD'S (CONDITION 8)
- ⑩ DETERMINE H<sub>2</sub> & VT EXTENT OF CONTAMINATION
- ⑪ HOW TO SOIL SAMPLE i.e. (ATTACHMENT 7)
- ⑫ ALL EQUIPMENT STEAM CLEAN & TRIPLE RINSED
- ⑬ CONTAMINATED SOIL OF SITE @ ANY TIME
- ⑭ HOW TO SOIL SAMPLE ~~after~~ EXCAVATION

STATE OF ILLINOIS  
ENVIRONMENTAL PROTECTION AGENCY

IL 532-0357  
ADM 39  
054-002

60f

Subject SELIG SEALING PRODUCTS, INC.

Data RCRA CLOSURE

Reviewed by WILLIAM / S. WATT II

Date JULY 23, 1993

DISCUSSION OF FINAL ACTION TO BE TAKEN

- (15) Cleanup down to CVO's
- (16) DON'T EXCAVATE  $\Rightarrow$  INFORM US
- (17) CONTAMINATION down to GROUNDWATER
- (18) GROUNDWATER HIT DURING EXCAVATION
- (19) POST CLOSURE IN LIEU OF CLEAN CLOSURE
- (20) DON'T MAKE A WASTE PILE
- (21) RESPONSIBLE PROPERTY TRANSFER ACT
- (22) FACILITY REPORTING UNIT



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY  
REGION 5

MEMORANDUM

**DATE:** July 15<sup>th</sup>, 2009  
**SUBJECT:** Determination of Need for an Investigation  
Facility Name: Selig Sealing Prod Inc.  
EPA ID #: ILD 066 197 195  
**FROM:** Amanda Dampitz  
**TO:** George Hamper

☒ **CA070NO** Determination of Need for an Investigation-Investigation is not Necessary

Reason for Determination

- ☐ Preliminary Assessment/Visual Site Inspection (PA/VSI) did not recommend any further investigation
- ☐ PA/VSI recommendations do not warrant RRB attention
- ☐ Phase 1 Environmental Site Assessment (ESA) did not recommend further investigation
- ☒ Phase 2 ESA did not recommend further investigation
- ☐ Phase 1/Phase 2 ESA recommendations do not warrant RRB attention
- ☐ Company representative asserts that the site is clean
- ☐ Not subject to corrective action
- ☐ Enrolled in other clean-up program
- ☐ Superfund No Further Action Decision
- ☐ PA/VSI recommendations have been implemented
- ☐ Removal
- ☐ Site Remediation Program
- ☐ Site Remediation Program No Further Remediation letter was issued
- ☐ Superfund
- ☐ Superfund No Further Action Decision
- ☐ Superfund Base relocation Closure
- ☐ Voluntary Remediation Program
- ☐ Other

☐ **CA070YE** Determination of Need for an Investigation – Investigation is Necessary

Reason for Determination

- ☐ PA/VSI recommends further investigation
- ☐ ESA recommends further investigation
- ☐ Other

☐ **No determination can be made** – More Information Needed

☐ Approved

☐ Not Approved

Signed: Amanda Dampitz Date: 7/15/09  
Signed: George Hamper Date: SEP 30 2009



**Determination Date: July 8, 2009**

**Determination: Phase II ESA did not recommend further investigation.**

## Facility Contact Form (No PA/VSI)

Facility Name: Selig Sealing Prod INC

EPA ID#: ILD 066 197 195 Address: 342 E. Wabash

City: Forrest State: IL

Units Closed: (2) SO1 Date: 04/26/1994

Facility Representative: Owen Smith Phone# 815-657-8265 x109

Email Address: ros@seligsealing.com

Date of phone conversation: July 8, 2009

Selig Sealing manufactures sealing solutions for global food, pharmaceutical and personal care.

SQG - active

The area that went through closure was from pre-activities where organic solvents were found. Upon remediation another area of concern was located, which also went through closure.

The company purchased the land in 1972. The original facility was built in the late 60's and was owned by a trailer refitting company. Selig Sealing built more buildings after purchase.

Y / ☒ Is there known soil or groundwater contamination?

Contaminants:

☒ / N Has the parcel been split or was there a change in ownership?

☒ / N / ? Was a Phase 1 or Phase 2 report prepared in connection with a sale of the property?

☒ / N Can we have a copy?

☒ / N Is the facility currently operating?

- When was the plant built? 1972/late 60's
- What products are/were made?  
Sealing solutions for global food, pharmaceutical and personal care.



- What chemicals were used in the process?

Raw products: solvents (acetone and ethyl acetate), paper, plastics

Degreasers, which a firm takes offsite for recycling and disposal

Y / N Are there any known spills from electrical equipment containing PCBs?

Y / N Have spills always been cleaned up properly?

- What kinds of solid wastes were produced?

Garbage (taken off site), batteries (which are recycled)

HW – flammable liquids (acetone and ethyl acetate) and solid flammable products

- How were solid wastes managed?

Y / N Waste piles                      Quantity: \_\_\_\_\_

Containing:

Y / N On-site landfill                      Quantity: \_\_\_\_\_

Containing:

- How were liquid wastes (such as solvents) managed?

☒ Y / N Drums

Containing:

Y / N Above-ground tanks      Quantity: \_\_\_\_\_

Containing:

Y / N Underground tanks      Quantity: \_\_\_\_\_ How long have they been in use? \_\_\_\_\_

What are they made out of: Steel / Cement / Other: \_\_\_\_\_

Any known leaks:

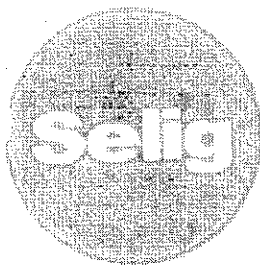
Y / N Underground pipes

Containing:

- How were wastewaters managed?

Y / N Tanks

Y / N Pits, ponds, or lagoons (surface impoundments)



Freshness and Protection  
for Today's Packaging

15 July, 2009

Ms. Amanda Dampitz,  
Environmental Protection Specialist,  
USEPA, Region V  
Corrective Action Section 2  
Land and Chemical Division  
77 West Jackson LU-9J  
Chicago, IL 60604

Dear Ms. Dampitz:

In response to your request of 8 July 2009, I am enclosing three documents:  
Douglas W. Clay, P.E., ILEPA Waste Management Unit 1 RCRA closure letter  
dated 26 April 1994, Edwin C. Bakowski, P.E., ILEPA Waste Management Unit 2  
RCRA closure letter dated 17 October 1995, and Eric P. Leitz, Hydrogeologist,  
GaiaTech Incorporated, letter report on Limited Phase II Groundwater  
Investigation dated 22 March 2005.

As indicated by these documents, soil and groundwater impacts from historical  
operations at Selig's 343 East Wabash Street, Forrest, Illinois facility were  
addressed through corrective action and closure activities under the Resources  
Conservation and Recovery Act (RCRA) under the review and approval of the  
Illinois EPA (ILEPA) in the mid-1990's. Two waste management units (WMUs 1  
and 2) were remediated between 1993 and 1995, to address chlorinated VOC  
compounds, including soil excavation and confirmatory sampling. ILEPA issued  
letters approving the closure of these WMUs in April 1994 and October 1995,  
confirming that the contaminants had been reduced to below levels of regulatory  
concern.

Subsequently in 2003, a Phase II investigation was performed that included  
additional soil and groundwater sampling, which confirmed the results of the  
RCRA closures.

**Corporate Headquarters:**

Selig Sealing Products, Inc.  
Wabash  
St. IL 61741

(815) 657-8233  
(815) 657-7584 (fax)  
ccrp-selig@seligsealing.com

**North American Sales:**

Selig Sealing Products, Inc.  
2132 Deepwater Lane, Suite 232  
Naperville, IL 60564

(630) 922-3158  
(630) 922-8469 (fax)  
sales@seligsealing.com

**European Manufacturing and Sales:**

Selig Sealing Products, Inc.  
Greenock Road Trading Estate  
Slough, Berkshire  
SL 4QQ  
+44 (0) 1753 773000  
+44 (0) 1753 773111 (fax)  
corp-selig@seligsealing.com

**Canadian Manufacturing:** [www.seligsealing.com](http://www.seligsealing.com)

Selig Sealing Products, Inc.  
226 Industrial Parkway North  
Ontario, Canada L4G 4C3  
(905) 727-0114  
(905) 727-8544  
corp-selig@seligsealing.com

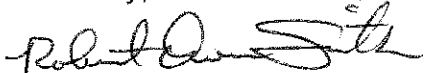
Page two of two  
15 July, 2009  
Ms. Amanda Damptz, USEPA,

As noted in the attached 2005 Limited Phase II letter, this investigation found non-detectable or very low VOC levels below the most stringent ILEPA soil and groundwater remediation objectives. More recently in 2005, in connection with the current owners' acquisition of the company, a further Phase II investigation was performed by GaiaTech, the results of which are summarized in the attached 22 March 2005 letter. This most recent subsurface investigation of several potential areas of concern identified by GaiaTech included thirteen borings, VOC screening, and analysis of soil and groundwater samples. Again, the results of this investigation indicated only very low VOC levels that were below the applicable ILEPA standards.

Based on these three sets of remedial and investigatory activities, Selig believes that its site has been thoroughly investigated and fully remediated, and that the enclosed documents confirm that there is no soil or groundwater contamination on our property that requires further action or poses any environmental or regulatory concern.

Should you have any questions, please do not hesitate to contact me.

Sincerely,

A handwritten signature in black ink, appearing to read "Robert Owen Smith", written in a cursive style.

Robert Owen Smith  
Director, Corporate Compliance and Technology

Enclosures: (3)

John  
Coff



State of Illinois

# ENVIRONMENTAL PROTECTION AGENCY

Mary A. Gade, Director  
217/524-3300

2200 Churchill Road, Springfield, IL 62794-9276

April 26, 1994

Mr. Bill Bennington  
Selig Sealing Products, Inc.  
342 E. Wabash  
P.O. Box 37  
Forrest, Illinois 61741

Re: 1050455002 -- Livingston County  
Selig Sealing Products, Inc.  
ILD066197195  
Log No. 710-M-1  
Received: March 16, 1994  
RCRA Closure

Dear Mr. Bennington:

This is in response to the certification of closure submitted by Ted W. Nehrkorn, Environmental Science & Engineering, Inc. for the hazardous waste container storage areas at the above referenced facility. This unit is referred to as "Waste Management Unit WMU-1". This certification, signed by a representative of the owner/operator, Joseph M. Giles and an independent registered professional engineer, Michael J. Hoffman, indicated that the subject hazardous waste units had been closed in accordance with the plan approved by the Agency on September 20, 1993.

The subject hazardous waste management unit was inspected by a representative of this Agency on April 14, 1994. The inspection revealed that the units were closed in accordance with the closure plan. In addition, a review of the closure certification and accompanying closure documentation report also indicates that the unit was closed in accordance with the approved closure plan. Therefore, the Agency has determined that closure of the one (1) hazardous container storage area at the above-referenced facility has apparently met the requirements of 35 IAC 725.

As a result of completing closure of the subject hazardous waste management unit, Selig Sealing must:

1. Still meet the requirements of 35 IAC 725 for a hazardous waste container storage area unit referred to as "WMU-2".
2. Continue to meet the applicable requirements of 35 IAC 721, 722 and 728.

Should you have any questions regarding this matter, please  
contact William T. Sinnott, II at 217/524-3300.

Sincerely,



Douglas W. Clay, P.E.  
Hazardous Waste Branch Manager  
Permit Section, Bureau of Land  
JVM

cc: USEPA Region V, Lorraine Kosik  
Ted W. Nehrkorn, E.S.E.



State of Illinois

# ENVIRONMENTAL PROTECTION AGENCY

Mary A. Gade, Director

2200 Churchill Road, Springfield, IL 62761-1176

217/524-3300

October 17, 1995

Selig Sealing Products, Inc.  
Attn: Mr. Bill Bennington  
342 East Wabash  
Post Office Box 37  
Forrest, Illinois 61741

Re: 1050455002 -- Livingston County  
Selig Sealing Products, Inc.  
ILD066197195  
RCRA-Closure  
Closure Log #C-710  
Received: August 9, 1995

Dear Mr. Bennington:

This is in response to the certification of closure submitted by Environmental Science & Engineering, Inc. for the hazardous waste container storage area (referred to as WMU-2) at the above-referenced facility. This certification, signed by a representative of the owner/operator, Joseph M. Giles and an independent registered professional engineer, Michael J. Hoffman, P.E. indicated that the subject hazardous waste management unit had been closed in accordance with the plan initially approved by the Agency on September 20, 1993.

The subject hazardous waste management unit was inspected by a representative of this Agency on September 14, 1995. The inspection revealed that the unit was closed in accordance with the approved closure plan. In addition, a review of the closure certification and accompanying closure documentation report also indicates that the unit was closed in accordance with the approved closure plan. Therefore, the Agency has determined that closure of WMU-2 has apparently met the requirements of 35 IAC 725.

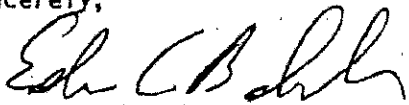
As a result of completing closure of the subject hazardous waste management unit:

1. No further action is necessary to fulfill the requirements of the closure plan initially approved by the Agency on September 20, 1993 for two hazardous waste container storage areas at the above-referenced facility. The Agency previously accepted certification of closure for the other storage area, referred to as WMU-1 on April 26, 1994.
2. This facility must continue to meet the requirements of 35 IAC 722 Standards Applicable to Generators of Hazardous Waste and 35 IAC 728 Land Disposal Restrictions.

Page 2

Should you have any questions regarding this matter, please contact William Sinnott, II at 217/524-3300.

Sincerely,



Edwin C. Bakowski, P.E.  
Manager, Permit Section  
Bureau of Land

ECB:WYS/mls/406X/21-22

JEM

cc: USEPA Region V, Hak Cho  
Michael J. Hoffman, P.E.



200 North LaSalle Street • Suite 2600 • Chicago, IL 60601

**CONFIDENTIAL**

March 22, 2005

Mr. Mark V. Grimes  
Vice President - Behrman Capital  
Four Embarcadero Center  
Suite 3640  
San Francisco, CA 94111

**Re: Limited Phase II Groundwater Investigation  
Selig Sealing Products, Inc.  
342 East Wabash Avenue  
Forrest, Illinois**

Dear Mr. Grimes:

GaiaTech Incorporated conducted a Limited Phase II Groundwater Investigation of the Selig facility located at 342 East Wabash Avenue in Forrest, Illinois. This letter report summarizes GaiaTech's Phase II Investigation activities and findings, which were performed to investigate potential subsurface contamination at the site.

**Site Background**

Based on various historical sources, the majority of the site was developed in 1968 with a portion of the site building constructed on undeveloped property. The site was occupied by a trucking and warehousing operation and a ready-mix concrete company from 1968 until 1972, when Selig began operations at the site.

Selig manufactures induction heat seals and other closure seal and liner products which are primarily used on food, drug and household product containers. Selig's induction seals and other lining products are composed of multiple laminated structures of various combinations of aluminum foil, plastic films, expanded polyethylene foams, pulpboard, and paper.

The site has been used for generally the same operations since Selig began operations in 1972. Only minor changes in chemical usage have occurred over the years, e.g. the change from methyl ethyl ketone (MEK) to an ethyl acetate and acetone mixture (used as a solvent for the application of inks and adhesives in printing and laminating processes), and the ongoing phase out of solvent based inks in favor of water based inks. A solvent recovery unit was installed in the late 1990s which reduced the amount of hazardous waste



generated at the site, lowering Selig's waste generator status. Two waste management units (WMUs) underwent cleanup and Resource Conservation and Recovery Act (RCRA) closure in the mid-1990s. The northern, currently vacant, portion of the site was formerly owned by Standard Oil Company and Dix Terminal Corporation (potentially for bulk petroleum distribution) between 1961 and at least 1972, and a former railroad right-of-way was located on the west side of the property. The northwest corner of the property was historically developed with support structures, including an "oil tank" which may have been related to the former railroad operations or bulk petroleum operations. These historical uses of the site, in addition to the RCRA closure of the WMUs, represent a potential for subsurface impact to the site.

Surrounding properties to the south and east appear to have been undeveloped agricultural land since at least 1940. Wabash Avenue north of the site (and a railroad right-of-way and small rail yard farther north), and a railroad right-of-way west of the site have been present since at least 1940. A scrap yard appears to have been present west of railroad right-of-way since at least the 1960s. Historical operations at the scrap yard may have a potential for subsurface impact to the site, although the scrap yard appears to crossgradient of the site.

#### **Previous Phase II Investigation**

In 2003 Clayton Group Services performed a limited subsurface investigation at the site to evaluate the two former WMUs which underwent RCRA closure in the 1990s to verify clean closure was achieved, and to characterize the shallow groundwater at the site. Two shallow soil borings were installed in the vicinity of WMU-1 and six borings were installed in the vicinity of WMU-2. One shallow groundwater monitoring well was installed in the area of WMU-2, and two wells were installed along the western property boundary, west of WMU-2. Clayton utilized the water levels in the three monitoring wells to calculate the shallow groundwater flow direction at the site. Groundwater flow was determined to be toward the southwest.

Five soil samples were collected for volatile organic compound (VOC) analysis from the eight soil borings (2 from WMU-1, and 3 from WMU-2). No VOCs were detected in any of the soil samples, with the exception of 0.006 milligrams per kilogram (mg/kg, approximately equivalent to parts per million, or ppm) of tetrachloroethene (PCE) in one of the soil samples, which was well below the most stringent Illinois soil remediation objectives (SROs).

Three groundwater samples were collected, one from each of the three monitoring wells, and analyzed for VOCs. No VOCs were detected with the exception of a low level of 1,1,1-trichloroethane (1,1,1-TCA) reported at a concentration of 0.0169 mg/liter (mg/l, approximately equivalent to parts per million, or ppm), which was well below the most stringent Illinois groundwater remediation objectives (GROs).

Based on the analytical data, Clayton determined that the WMUs had been properly closed, and that no further assessment of the WMUs was warranted.

#### **Areas of Concern**

Based on this information, the following concerns were identified for further investigation:

- The historical presence of bulk petroleum operations, ready-mix concrete operations, and railroad operations on the northern and northwestern portions of the site.

- The closure and investigation of the two WMUs appears to have been adequately completed for closure purposes, however, the closure investigation and subsequent investigation in 2003 did not adequately investigate potential sources of impact which led to the required RCRA closure.
- West of the former right-of-way is a metal scrap yard (Baker Enterprises), a facility that collects and stores metal scrap materials for recycling in large piles placed directly on the ground. Several former USTs were observed in the scrap piles, along with crushed or shredded 55-gallon drums, and various automotive components (including oily engines and fuel tanks). While the scrapyard is likely crossgradient of the site, based on the nature of the scrap and the general poor housekeeping practices observed at this facility, there is some potential for impact to the site.

### Field Activities

Prior to field activities, GaiaTech, through the drilling subcontractor, completed a subsurface utility clearance through Julie, the Illinois one-call utility notification service. Specific soil boring locations were then determined by GaiaTech based on the location of potential concerns at the site. On March 15, 2005, GaiaTech reviewed the markings with the site representative, Mr. Robert Owen Smith, who provided additional on-site utility location information.

On March 15, 2005, GaiaTech installed a total of 13 borings at the site (as shown on the attached figure). Nine of the borings were converted to temporary monitoring wells to assess potential impacts to the site groundwater related to historical on-site and off-site operations.

Each of the soil borings was completed using a Geoprobe® sampling unit. Continuous subsurface soil samples were collected using 4-foot stainless steel sampling tubes lined with acetate sample liners. Upon retrieval from the sampling tube, each soil sample was visually inspected for logging purposes and evidence of contamination. Each soil sample was then collected into separate sample bags to be used for field-screening (described further below) and classification prior to collecting soil samples for laboratory analysis. Soil characteristics such as soil type, color, moisture, consistency, grain size, odor, and plasticity were recorded on soil boring logs. Copies of these logs are attached.

Upon completion of the soil boring, each of the soil samples underwent field screening for ionizable volatile organics contamination using a Mini-Rae photo-ionization detector (PID) equipped with a 10.6eV lamp, calibrated to a 100 volumetric parts per million (Vppm) isobutylene standard. The field screening was used to provide an indication of the potential presence of VOCs to aid in the selection of samples for laboratory analysis. Specific PID field screening procedures were as follows:

- The soil sample was placed in a sample bag.
- The soil boring number and sample depth was written on the sample bag.
- The sample was allowed to warm up under room temperatures.
- The PID was utilized to draw the headspace from above the soil-air interface.
- The maximum PID reading was recorded on each respective soil boring log.

Typically, one soil sample from each boring in which field screening suggested the largest potential VOC content was retained for possible laboratory analysis. The samples were then secured in a sample cooler and preserved with ice. Under strict sample chain-of-custody procedures, the samples were delivered to First Environmental Laboratories in Naperville, Illinois, a National Environmental Laboratory Accreditation Program (NELAP) accredited laboratory.

Upon completion of soil boring and sampling activities, and between uses to avoid cross contamination, all down-hole soil boring and non-dedicated sampling equipment was decontaminated using an Alconox®/water wash and scrubbing, followed by a potable water rinse. Once the last soil sample and groundwater sample was retrieved from a boring location, the borehole was back-filled with the soil cuttings and bentonite, and the surface was substantially restored (to the extent feasible) to its original condition.

The following is a summary of the scope of work performed at the Selig site:

- Four borings (GP-1 through GP-4) were installed on the northwestern and northern portion of the site (former railroad, concrete and bulk petroleum areas).
- One boring (GP-9) was installed near the western property boundary (near the scrap yard), along with GP-1 and GP-2, which are also near the scrap yard.
- One boring (GP-5) was installed near the former WMU-1.
- Six borings (GP-6, GP-7 and GP-10 through GP-13) were installed in/near the former WMU-2.
- One boring (GP-8) was installed on the western portion of the site for full site coverage.

#### **Geology, Hydrogeology and Field Screening Results**

Borings were advanced to depths of 8 and 12 feet below ground surface (bgs). The subsurface materials typically encountered at the site consisted of 2 to 4 feet of loose, brown fill composed of silty sand, sand or sand and gravel. Some black sandy cinder layers were encountered in the fill on the northern and western portions of the site (the former railroad areas). Beneath the fill was a light brown to gray silty clay to a depth of 5 to 7 feet bgs. Beneath the clay was a saturated sand and gravel to a depth of between 7.5 and 12 feet bgs (typically between 5 and 10 feet bgs). The sand and gravel extended to the maximum depth explored (12 feet bgs) in the borings installed on the southern portion of the site, and was underlain by a stiff gray clay to the maximum depth explored on the northern portion of the site.

In general, soils in all of the borings (GP-1 through GP-13) did not exhibit any suspect staining, odors or elevated PID readings; and PID readings ranged from 0.0 to 0.7 Vppm, within the normal background range, with the exception of soils in boring GP-3, which exhibited a slight petroleum odor and a maximum PID reading of 0.5 Vppm, and GP-1, which exhibited a slight petroleum odor and a maximum PID reading 8.8 Vppm.

Generally, saturated sand and gravel was encountered at depths between 5 and 7 feet bgs and continued to 10 feet bgs on the northern portion of the site, where a stiff gray clay was encountered around 10 feet bgs, and to 12 feet bgs on the southern portion of the site (the maximum depth explored). According to boring logs included with Clayton's previous Phase II, the sand and gravel is underlain by clay on the southern portion of the site as well at depths between 13 and 15 feet bgs.

#### **Soil Analytical Results**

Under the Tiered Approach to Corrective Action (TACO) (Appendix B, Table A, dated July, 2001), the Illinois Environmental Protection Agency (IEPA) has defined Tier I soil remediation objectives (SROs) for residential and industrial/commercial properties, as well as construction worker standards. The remediation objectives vary depending on the exposure route and the compounds' potential to leach into the groundwater. The various standards for soil at residential, industrial/commercial and construction properties are presented in Table 1 along with the soil sample analytical results.

A total of two soil samples were collected and submitted for laboratory analysis. Soil sample GP-3 (2-4') was analyzed for VOCs and polynuclear aromatic compounds (PAHs). Soil sample GP-6 was analyzed for VOCs.

A low level of one VOC compound, PCE, was detected in the soil sample collected from boring GP-6 at a concentration of 0.009 mg/kg, which is below the most restrictive SRO. No other VOCs were detected in GP-3 or GP-6.

Low levels of fifteen PAH compounds were detected in soil sample GP-3, and two PAHs were above the applicable SROs. The PAH impacted material is likely related to fill materials containing cinders, most likely associated with the former use of a portion of the site for railroad related operations.

### Groundwater Analytical Results

Under the Tiered Approach to Corrective Action (TACO) regulations (Appendix B, Table E, dated July, 2001), the Illinois Environmental Protection Agency (IEPA) has defined groundwater remediation objectives (GROs) for Class I potable resource groundwater and Class II general resource groundwater. Per 35 ILL Admin. Code Section 620.210, Class I potable resource groundwater is defined as groundwater located 10 feet or more below the land surface and within:

- The minimum setback zone of a potable water supply well;
- Unconsolidated sand and/or gravel which is 5 feet or more in thickness;
- Sandstone which is 10 feet or more in thickness, or fractured carbonate bedrock which is 15 feet or more in thickness; or
- Any geologic material which is capable of either sustained groundwater yield of 150 gallons per day or more from a 12-inch borehole from a thickness of 15 feet or less; or hydraulic conductivity of  $1 \times 10^{-4}$  cm/sec or greater.

Class II general resource groundwater is defined as groundwater which does not meet the Section 620.210 definition of a Class I groundwater. Based on the geologic conditions encountered during the investigation, the groundwater encountered at the site may be classified as Class II groundwater. However, until an actual determination of the aquifer classification has been completed, it must be assumed that the groundwater is Class I for purposes of discussion. The various standards for Class I and Class II groundwater are presented in Table 1 along with the groundwater sample analytical results.

A total of 9 groundwater samples were collected and submitted for laboratory analysis for VOCs and PAHs. Four samples were also analyzed for total RCRA 8 metals. The groundwater sampling results are discussed below.

### VOCs

Low levels of two VOC compounds, cis-1,2-dichloroethene (cis-1,2-DCE) and trichloroethene (TCE), were detected in one groundwater sample collected from boring GP-6 at concentrations of 0.009 and 0.008 milligrams per liter (mg/l), respectively. The concentration of cis-1,2-DCE was below the GRO of 0.07 mg/l, however, the concentration of TCE was above the GRO of 0.005 mg/l for Class I groundwater, but below the Class II GRO of 0.025 mg/l. GP-6 was installed near the former location of the Clayton monitoring well MW-1, which was near the center of WMU-2.

No other VOC compounds were detected in the groundwater samples from this or the other borings. The VOC compound 1,1,1-TCA was detected in one well (MW-1) during the previous 2003 Clayton Phase II at a concentration of 0.0169 mg/l, below the GRO of 0.2 mg/l.

#### PAHs

No PAHs were detected in any of the nine groundwater samples.

#### Metals

Trace concentrations of the total metals barium, chromium, lead and silver were detected in some of the four groundwater samples analyzed for metals. These appear to be background level concentrations, as none exceeded the applicable GROs.

#### Conclusions

GaiaTech has completed this limited Phase II soil and groundwater sampling and has the following conclusions:

- **Impacted Fill:** One shallow soil sample collected at the site was found to contain slightly elevated concentrations of PAHs, some above Illinois Tier I SROs. The sample was collected in fill material that contained black sand, gravel and cinders; fill material impacted with PAHs is likely present the northern and western portions of the site (at or near the former railroad operation areas), as similar fill material was encountered in the five borings installed in this area of the site. Any site re-development or other earthwork at the site which would require removal and disposal of soils would require the soils to be disposed of as a special waste, if soils are unable to be managed on-site. If impacted fill material is to be managed on-site, the fill material should be covered with pavement, 3 feet of clean soil, and/or building structures to prevent potential human exposures.
- **Trace to low concentrations of the chlorinated solvent compounds** cis-1,2-DCE and TCE (and 1,1,1-TCA, which was identified during a previous investigation), were detected in the groundwater sample collected from the center of the former WMU-2. The concentrations of these compounds are generally low, however, the concentration of TCE did exceed the applicable Class I GRO, but was below the Class II GRO. PCE was detected in the soil in this area during the current and previous investigations at concentrations below the SROs.

The impacted groundwater appears to be limited to the area immediately around GP-6 (and the former MW-1) because no VOCs were detected in nearby GP-7 during the current investigation or at MW-2 or MW-3 installed during the previous investigation. Also, no VOCs were detected in an upgradient sample (GP-8), or the sample collected near former WMU-1 (GP-5).

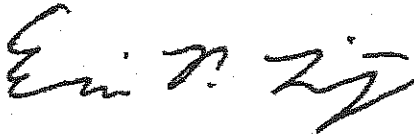
In conclusion, the soil and groundwater impacted with chlorinated solvents appears to be limited to the former area of the former WMU-2, and does not appear to be a significant impact issue based on the low groundwater concentrations and limited extent of the impact.

Mr. Mark Grimes  
March 22, 2005  
Page 7

Confidential  
Limited Phase II Site Investigation  
Selig Sealing Products, Inc., Forrest, Illinois

We appreciate the opportunity to be of service on this project. Please do not hesitate to call the undersigned at 312-541-4200, if you have any questions or require additional documentation.

Sincerely,  
GaiaTech Incorporated

A handwritten signature in black ink, appearing to read "Eric P. Leitz". The signature is stylized with a large "E" and a long, sweeping underline.

Eric P. Leitz  
Hydrogeologist

Attachments: Boring Location Map  
Boring Logs  
Analytical Results Summary of Detections Table  
Site Photographs  
Previous Phase II Report  
Laboratory Analytical Report

I am an Environmental Protection Specialist for the U.S. EPA in Chicago. Our office is currently updating our records in regards to properties that once treated, stored, or disposed of hazardous waste. Komatsu-Dresser Company of 2300 N.E. Adams Peoria, Illinois, once treated, stored, or disposed of hazardous waste at the aforementioned address. The EPA ID# for the permitted site is ILD 000 671 081.

This permit number applied to one RCRA regulated unit that went through RCRA closure in August 29<sup>th</sup> 1988. The unit was a container storage area (barrel, drums, etc.). The Hazardous and Solid Waste Amendments of 1984 indicated that any site that was once permitted to transfer, store, or disposed of hazardous waste could potentially be required to clean up the entire site. Our office is interested in asserting that Komatsu-Dresser Company has no need for further investigation regarding hazardous waste by gathering documentation or any information that states that the facility has no areas of concern or known soil or groundwater contamination.

If a Phase I or II Environmental Site Assessment was ever prepared in connection with the sale of the property or loan application we would like to obtain a copy for our records. It is our hope that the ESA asserts that no further remediation is necessary at the site. If a Phase I or II report has not previously been completed for the facility please contact our office so that we may discuss the status of the facility.

Storage:

SO1 – container (barrel, drum, etc.)

SO2 – tank

SO3 – waste pile

SO4 – Surface impoundment

Treatment:

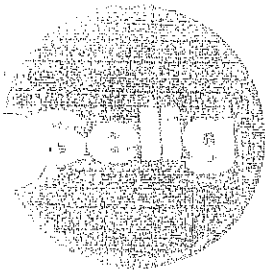
TO1 – Tank

TO2 – surface impoundment

TO3 – incinerator

Disposal:

D79 – Injection Well



Freshness and Protection  
for Today's Packaging

15 July, 2009

Ms. Amanda Damptz,  
Environmental Protection Specialist,  
USEPA, Region V  
Corrective Action Section 2  
Land and Chemical Division  
77 West Jackson LU-9J  
Chicago, IL 60604

Dear Ms. Damptz:

In response to your request of 8 July 2009, I am enclosing three documents:  
Douglas W. Clay, P.E., ILEPA Waste Management Unit 1 RCRA closure letter  
dated 26 April 1994, Edwin C. Bakowski, P.E., ILEPA Waste Management Unit 2  
RCRA closure letter dated 17 October 1995, and Eric P. Leitz, Hydrogeologist,  
GaiaTech Incorporated, letter report on Limited Phase II Groundwater  
Investigation dated 22 March 2005.

As indicated by these documents, soil and groundwater impacts from historical  
operations at Selig's 343 East Wabash Street, Forrest, Illinois facility were  
addressed through corrective action and closure activities under the Resources  
Conservation and Recovery Act (RCRA) under the review and approval of the  
Illinois EPA (ILEPA) in the mid-1990's. Two waste management units (WMUs 1  
and 2) were remediated between 1993 and 1995, to address chlorinated VOC  
compounds, including soil excavation and confirmatory sampling. ILEPA issued  
letters approving the closure of these WMUs in April 1994 and October 1995,  
confirming that the contaminants had been reduced to below levels of regulatory  
concern.

Subsequently in 2003, a Phase II investigation was performed that included  
additional soil and groundwater sampling, which confirmed the results of the  
RCRA closures.

**Corporate Headquarters:**

Selig Sealing Products, Inc.  
343 E. Wabash  
Forrest, IL 61741

(815) 657-8233  
(815) 657-7584 (fax)  
corp-selig@seligsealing.com

**North American Sales:**

Selig Sealing Products, Inc.  
2132 Deepwater Lane, Suite 232  
Naperville, IL 60564

(630) 922-3158  
(630) 922-8469 (fax)  
sales@seligsealing.com

**European Manufacturing and Sales:**

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+44 (0) 1753 773111 (fax)  
corp-selig@seligsealing.com

**Canadian Manufacturing:** [www.seligsealing.com](http://www.seligsealing.com)

Selig Sealing Products, Inc.  
226 Industrial Parkway North  
Ontario, Canada L4G 4C3  
(905) 727-0114  
(905) 727-8544  
corp-selig@seligsealing.com



Page two of two  
15 July, 2009  
Ms. Amanda Damptz, USEPA,

As noted in the attached 2005 Limited Phase II letter, this investigation found non-detectable or very low VOC levels below the most stringent ILEPA soil and groundwater remediation objectives. More recently in 2005, in connection with the current owners' acquisition of the company, a further Phase II investigation was performed by GaiaTech, the results of which are summarized in the attached 22 March 2005 letter. This most recent subsurface investigation of several potential areas of concern identified by GaiaTech included thirteen borings, VOC screening, and analysis of soil and groundwater samples. Again, the results of this investigation indicated only very low VOC levels that were below the applicable ILEPA standards.

Based on these three sets of remedial and investigatory activities, Selig believes that its site has been thoroughly investigated and fully remediated, and that the enclosed documents confirm that there is no soil or groundwater contamination on our property that requires further action or poses any environmental or regulatory concern.

Should you have any questions, please do not hesitate to contact me.

Sincerely,

A handwritten signature in dark ink, appearing to read "Robert Owen Smith", written in a cursive style.

Robert Owen Smith  
Director, Corporate Compliance and Technology

Enclosures: (3)

Joe  
COF



State of Illinois

# ENVIRONMENTAL PROTECTION AGENCY

Mary A. Gade, Director  
217/524-3300

2200 Churchill Road, Springfield, IL 62794-9276

April 26, 1994

Mr. Bill Bennington  
Selig Sealing Products, Inc.  
342 E. Wabash  
P.O. Box 37  
Forrest, Illinois 61741

Re: 1050455002 -- Livingston County  
Selig Sealing Products, Inc.  
ILDO66197195  
Log No. 710-M-1  
Received: March 16, 1994  
RCRA Closure

Dear Mr. Bennington:

This is in response to the certification of closure submitted by Ted W. Nehrkorn, Environmental Science & Engineering, Inc. for the hazardous waste container storage areas at the above referenced facility. This unit is referred to as "Waste Management Unit WMU-1". This certification, signed by a representative of the owner/operator, Joseph M. Giles and an independent registered professional engineer, Michael J. Hoffman, indicated that the subject hazardous waste units had been closed in accordance with the plan approved by the Agency on September 20, 1993.

The subject hazardous waste management unit was inspected by a representative of this Agency on April 14, 1994. The inspection revealed that the units were closed in accordance with the closure plan. In addition, a review of the closure certification and accompanying closure documentation report also indicates that the unit was closed in accordance with the approved closure plan. Therefore, the Agency has determined that closure of the one (1) hazardous container storage area at the above-referenced facility has apparently met the requirements of 35 IAC 725.

As a result of completing closure of the subject hazardous waste management unit, Selig Sealing must:

1. Still meet the requirements of 35 IAC 725 for a hazardous waste container storage area unit referred to as "WMU-2".
2. Continue to meet the applicable requirements of 35 IAC 721, 722 and 728.

Should you have any questions regarding this matter, please  
contact William T. Sinnott, II at 217/524-3300.

Sincerely,



Douglas W. Clay, P.E.  
Hazardous Waste Branch Manager  
Permit Section, Bureau of Land

JVM

cc: USEPA Region V, Lorraine Kosik  
Ted W. Nehrkorn, E.S.E.



State of Illinois

# ENVIRONMENTAL PROTECTION AGENCY

Mary A. Gade, Director

2200 Churchill Road, Springfield, IL 62791-9276

217/524-3300

October 17, 1995

Selig Sealing Products, Inc.  
Attn: Mr. Bill Bennington  
342 East Wabash  
Post Office Box 37  
Forrest, Illinois 61741

Re: 1050455002 -- Livingston County  
Selig Sealing Products, Inc.  
ILD066197195  
RCRA-Closure  
Closure Log #C-710  
Received: August 9, 1995

Dear Mr. Bennington:

This is in response to the certification of closure submitted by Environmental Science & Engineering, Inc. for the hazardous waste container storage area (referred to as WMU-2) at the above-referenced facility. This certification, signed by a representative of the owner/operator, Joseph M. Giles and an independent registered professional engineer, Michael J. Hoffman, P.E. indicated that the subject hazardous waste management unit had been closed in accordance with the plan initially approved by the Agency on September 20, 1993.

The subject hazardous waste management unit was inspected by a representative of this Agency on September 14, 1995. The inspection revealed that the unit was closed in accordance with the approved closure plan. In addition, a review of the closure certification and accompanying closure documentation report also indicates that the unit was closed in accordance with the approved closure plan. Therefore, the Agency has determined that closure of WMU-2 has apparently met the requirements of 35 IAC 725.


As a result of completing closure of the subject hazardous waste management unit:

1. No further action is necessary to fulfill the requirements of the closure plan initially approved by the Agency on September 20, 1993 for two hazardous waste container storage areas at the above-referenced facility. The Agency previously accepted certification of closure for the other storage area, referred to as WMU-1 on April 26, 1994.
2. This facility must continue to meet the requirements of 35 IAC 722 Standards Applicable to Generators of Hazardous Waste and 35 IAC 728 Land Disposal Restrictions.

Page 2

Should you have any questions regarding this matter, please contact William F. Sinnott, II at 217/524-3300.

Sincerely,



Edwin C. Bakowski, P.E.  
Manager, Permit Section  
Bureau of Land

ECB:WTS/mls/406X/21-22  
JKM

cc: USEPA Region V, Hak Cho  
Michael J. Hoffman, P.E.

**CONFIDENTIAL**

March 22, 2005

Mr. Mark V. Grimes  
Vice President - Behrman Capital  
Four Embarcadero Center  
Suite 3640  
San Francisco, CA 94111

**Re: Limited Phase II Groundwater Investigation  
Selig Sealing Products, Inc.  
342 East Wabash Avenue  
Forrest, Illinois**

Dear Mr. Grimes:

GaiaTech Incorporated conducted a Limited Phase II Groundwater Investigation of the Selig facility located at 342 East Wabash Avenue in Forrest, Illinois. This letter report summarizes GaiaTech's Phase II Investigation activities and findings, which were performed to investigate potential subsurface contamination at the site.

## Site Background

Based on various historical sources, the majority of the site was developed in 1968 with a portion of the site building constructed on undeveloped property. The site was occupied by a trucking and warehousing operation and a ready-mix concrete company from 1968 until 1972, when Selig began operations at the site.

Selig manufactures induction heat seals and other closure seal and liner products which are primarily used on food, drug and household product containers. Selig's induction seals and other lining products are composed of multiple laminated structures of various combinations of aluminum foil, plastic films, expanded polyethylene foams, pulpboard, and paper.

The site has been used for generally the same operations since Selig began operations in 1972. Only minor changes in chemical usage have occurred over the years, e.g. the change from methyl ethyl ketone (MEK) to an ethyl acetate and acetone mixture (used as a solvent for the application of inks and adhesives in printing and laminating processes), and the ongoing phase out of solvent based inks in favor of water based inks. A solvent recovery unit was installed in the late 1990s which reduced the amount of hazardous waste

generated at the site, lowering Selig's waste generator status. Two waste management units (WMUs) underwent cleanup and Resource Conservation and Recovery Act (RCRA) closure in the mid-1990s. The northern, currently vacant, portion of the site was formerly owned by Standard Oil Company and Dix Terminal Corporation (potentially for bulk petroleum distribution) between 1961 and at least 1972, and a former railroad right-of-way was located on the west side of the property. The northwest corner of the property was historically developed with support structures, including an "oil tank" which may have been related to the former railroad operations or bulk petroleum operations. These historical uses of the site, in addition to the RCRA closure of the WMUs, represent a potential for subsurface impact to the site.

Surrounding properties to the south and east appear to have been undeveloped agricultural land since at least 1940. Wabash Avenue north of the site (and a railroad right-of-way and small rail yard farther north), and a railroad right-of-way west of the site have been present since at least 1940. A scrap yard appears to have been present west of railroad right-of-way since at least the 1960s. Historical operations at the scrap yard may have a potential for subsurface impact to the site, although the scrap yard appears to crossgradient of the site.

### Previous Phase II Investigation

In 2003 Clayton Group Services performed a limited subsurface investigation at the site to evaluate the two former WMUs which underwent RCRA closure in the 1990s to verify clean closure was achieved, and to characterize the shallow groundwater at the site. Two shallow soil borings were installed in the vicinity of WMU-1 and six borings were installed in the vicinity of WMU-2. One shallow groundwater monitoring well was installed in the area of WMU-2, and two wells were installed along the western property boundary, west of WMU-2. Clayton utilized the water levels in the three monitoring wells to calculate the shallow groundwater flow direction at the site. Groundwater flow was determined to be toward the southwest.

Five soil samples were collected for volatile organic compound (VOC) analysis from the eight soil borings (2 from WMU-1, and 3 from WMU-2). No VOCs were detected in any of the soil samples, with the exception of 0.006 milligrams per kilogram (mg/kg, approximately equivalent to parts per million, or ppm) of tetrachloroethene (PCE) in one of the soil samples, which was well below the most stringent Illinois soil remediation objectives (SROs).

Three groundwater samples were collected, one from each of the three monitoring wells, and analyzed for VOCs. No VOCs were detected with the exception of a low level of 1,1,1-trichloroethane (1,1,1-TCA) reported at a concentration of 0.0169 mg/liter (mg/l, approximately equivalent to parts per million, or ppm), which was well below the most stringent Illinois groundwater remediation objectives (GROs).

Based on the analytical data, Clayton determined that the WMUs had been properly closed, and that no further assessment of the WMUs was warranted.

### Areas of Concern

Based on this information, the following concerns were identified for further investigation:

- The historical presence of bulk petroleum operations, ready-mix concrete operations, and railroad operations on the northern and northwestern portions of the site.

- The closure and investigation of the two WMUs appears to have been adequately completed for closure purposes, however, the closure investigation and subsequent investigation in 2003 did not adequately investigate potential sources of impact which led to the required RCRA closure.
- West of the former right-of-way is a metal scrap yard (Baker Enterprises), a facility that collects and stores metal scrap materials for recycling in large piles placed directly on the ground. Several former USTs were observed in the scrap piles, along with crushed or shredded 55-gallon drums, and various automotive components (including oily engines and fuel tanks). While the scrapyard is likely crossgradient of the site, based on the nature of the scrap and the general poor housekeeping practices observed at this facility, there is some potential for impact to the site.

### Field Activities

Prior to field activities, GaiaTech, through the drilling subcontractor, completed a subsurface utility clearance through Julie, the Illinois one-call utility notification service. Specific soil boring locations were then determined by GaiaTech based on the location of potential concerns at the site. On March 15, 2005, GaiaTech reviewed the markings with the site representative, Mr. Robert Owen Smith, who provided additional on-site utility location information.

On March 15, 2005, GaiaTech installed a total of 13 borings at the site (as shown on the attached figure). Nine of the borings were converted to temporary monitoring wells to assess potential impacts to the site groundwater related to historical on-site and off-site operations.

Each of the soil borings was completed using a Geoprobe® sampling unit. Continuous subsurface soil samples were collected using 4-foot stainless steel sampling tubes lined with acetate sample liners. Upon retrieval from the sampling tube, each soil sample was visually inspected for logging purposes and evidence of contamination. Each soil sample was then collected into separate sample bags to be used for field-screening (described further below) and classification prior to collecting soil samples for laboratory analysis. Soil characteristics such as soil type, color, moisture, consistency, grain size, odor, and plasticity were recorded on soil boring logs. Copies of these logs are attached.

Upon completion of the soil boring, each of the soil samples underwent field screening for ionizable volatile organics contamination using a Mini-Rae photo-ionization detector (PID) equipped with a 10.6eV lamp, calibrated to a 100 volumetric parts per million (Vppm) isobutylene standard. The field screening was used to provide an indication of the potential presence of VOCs to aid in the selection of samples for laboratory analysis. Specific PID field screening procedures were as follows:

- The soil sample was placed in a sample bag.
- The soil boring number and sample depth was written on the sample bag.
- The sample was allowed to warm up under room temperatures.
- The PID was utilized to draw the headspace from above the soil-air interface.
- The maximum PID reading was recorded on each respective soil boring log.

Typically, one soil sample from each boring in which field screening suggested the largest potential VOC content was retained for possible laboratory analysis. The samples were then secured in a sample cooler and preserved with ice. Under strict sample chain-of-custody procedures, the samples were delivered to First Environmental Laboratories in Naperville, Illinois, a National Environmental Laboratory Accreditation Program (NELAP) accredited laboratory.



Upon completion of soil boring and sampling activities, and between uses to avoid cross contamination, all down-hole soil boring and non-dedicated sampling equipment was decontaminated using an Alconox®/water wash and scrubbing, followed by a potable water rinse. Once the last soil sample and groundwater sample was retrieved from a boring location, the borehole was back-filled with the soil cuttings and bentonite, and the surface was substantially restored (to the extent feasible) to its original condition.

The following is a summary of the scope of work performed at the Selig site:

- Four borings (GP-1 through GP-4) were installed on the northwestern and northern portion of the site (former railroad, concrete and bulk petroleum areas):
- One boring (GP-9) was installed near the western property boundary (near the scrap yard), along with GP-1 and GP-2, which are also near the scrap yard.
- One boring (GP-5) was installed near the former WMU-1.
- Six borings (GP-6, GP-7 and GP-10 through GP-13) were installed in/near the former WMU-2.
- One boring (GP-8) was installed on the western portion of the site for full site coverage.

#### **Geology, Hydrogeology and Field Screening Results**

Borings were advanced to depths of 8 and 12 feet below ground surface (bgs). The subsurface materials typically encountered at the site consisted of 2 to 4 feet of loose, brown fill composed of silty sand, sand or sand and gravel. Some black sandy cinder layers were encountered in the fill on the northern and western portions of the site (the former railroad areas). Beneath the fill was a light brown to gray silty clay to a depth of 5 to 7 feet bgs. Beneath the clay was a saturated sand and gravel to a depth of between 7.5 and 12 feet bgs (typically between 5 and 10 feet bgs). The sand and gravel extended to the maximum depth explored (12 feet bgs) in the borings installed on the southern portion of the site, and was underlain by a stiff gray clay to the maximum depth explored on the northern portion of the site.

In general, soils in all of the borings (GP-1 through GP-13) did not exhibit any suspect staining, odors or elevated PID readings; and PID readings ranged from 0.0 to 0.7 Vppm, within the normal background range, with the exception of soils in boring GP-3, which exhibited a slight petroleum odor and a maximum PID reading of 0.5 Vppm, and GP-1, which exhibited a slight petroleum odor and a maximum PID reading 8.8 Vppm.

Generally, saturated sand and gravel was encountered at depths between 5 and 7 feet bgs and continued to 10 feet bgs on the northern portion of the site, where a stiff gray clay was encounter around 10 feet bgs, and to 12 feet bgs on the southern portion of the site (the maximum depth explored). According to boring logs included with Clayton's previous Phase II, the sand and gravel is underlain by clay on the southern portion of the site as well at depths between 13 and 15 feet bgs.

#### **Soil Analytical Results**

Under the Tiered Approach to Corrective Action (TACO) (Appendix B, Table A, dated July, 2001), the Illinois Environmental Protection Agency (IEPA) has defined Tier I soil remediation objectives (SROs) for residential and industrial/commercial properties, as well as construction worker standards. The remediation objectives vary depending on the exposure route and the compounds' potential to leach into the groundwater. The various standards for soil at residential, industrial/commercial and construction properties are presented in Table 1 along with the soil sample analytical results.

A total of two soil samples were collected and submitted for laboratory analysis. Soil sample GP-3 (2-4') was analyzed for VOCs and polynuclear aromatic compounds (PAHs). Soil sample GP-6 was analyzed for VOCs.

A low level of one VOC compound, PCE, was detected in the soil sample collected from boring GP-6 at a concentration of 0.009 mg/kg, which is below the most restrictive SRO. No other VOCs were detected in GP-3 or GP-6.

Low levels of fifteen PAH compounds were detected in soil sample GP-3, and two PAHs were above the applicable SROs. The PAH impacted material is likely related to fill materials containing cinders, most likely associated with the former use of a portion of the site for railroad related operations.

### Groundwater Analytical Results

Under the Tiered Approach to Corrective Action (TACO) regulations (Appendix B, Table E, dated July, 2001), the Illinois Environmental Protection Agency (IEPA) has defined groundwater remediation objectives (GROs) for Class I potable resource groundwater and Class II general resource groundwater. Per 35 ILL Admin. Code Section 620.210, Class I potable resource groundwater is defined as groundwater located 10 feet or more below the land surface and within:

- The minimum setback zone of a potable water supply well;
- Unconsolidated sand and/or gravel which is 5 feet or more in thickness;
- Sandstone which is 10 feet or more in thickness, or fractured carbonate bedrock which is 15 feet or more in thickness; or
- Any geologic material which is capable of either sustained groundwater yield of 150 gallons per day or more from a 12-inch borehole from a thickness of 15 feet or less; or hydraulic conductivity of  $1 \times 10^{-4}$  cm/sec or greater.

Class II general resource groundwater is defined as groundwater which does not meet the Section 620.210 definition of a Class I groundwater. Based on the geologic conditions encountered during the investigation, the groundwater encountered at the site may be classified as Class II groundwater. However, until an actual determination of the aquifer classification has been completed, it must be assumed that the groundwater is Class I for purposes of discussion. The various standards for Class I and Class II groundwater are presented in Table 1 along with the groundwater sample analytical results.

A total of 9 groundwater samples were collected and submitted for laboratory analysis for VOCs and PAHs. Four samples were also analyzed for total RCRA 8 metals. The groundwater sampling results are discussed below.

### VOCs

Low levels of two VOC compounds, cis-1,2-dichloroethene (cis-1,2-DCE) and trichloroethene (TCE), were detected in one groundwater sample collected from boring GP-6 at concentrations of 0.009 and 0.008 milligrams per liter (mg/l), respectively. The concentration of cis-1,2-DCE was below the GRO of 0.07 mg/l, however, the concentration of TCE was above the GRO of 0.005 mg/l for Class I groundwater, but below the Class II GRO of 0.025 mg/l. GP-6 was installed near the former location of the Clayton monitoring well MW-1, which was near the center of WMU-2.

No other VOC compounds were detected in the groundwater samples from this or the other borings. The VOC compound 1,1,1-TCA was detected in one well (MW-1) during the previous 2003 Clayton Phase II at a concentration of 0.0169 mg/l, below the GRO of 0.2 mg/l.

#### PAHs

No PAHs were detected in any of the nine groundwater samples.

#### Metals

Trace concentrations of the total metals barium, chromium, lead and silver were detected in some of the four groundwater samples analyzed for metals. These appear to be background level concentrations, as none exceeded the applicable GROs.

#### Conclusions

GaiaTech has completed this limited Phase II soil and groundwater sampling and has the following conclusions:

- **Impacted Fill:** One shallow soil sample collected at the site was found to contain slightly elevated concentrations of PAHs, some above Illinois Tier I SROs. The sample was collected in fill material that contained black sand, gravel and cinders; fill material impacted with PAHs is likely present the northern and western portions of the site (at or near the former railroad operation areas), as similar fill material was encountered in the five borings installed in this area of the site. Any site re-development or other earthwork at the site which would require removal and disposal of soils would require the soils to be disposed of as a special waste, if soils are unable to be managed on-site. If impacted fill material is to be managed on-site, the fill material should be covered with pavement, 3 feet of clean soil, and/or building structures to prevent potential human exposures.
- Trace to low concentrations of the chlorinated solvent compounds cis-1,2-DCE and TCE (and 1,1,1-TCA, which was identified during a previous investigation), were detected in the groundwater sample collected from the center of the former WMU-2. The concentrations of these compounds are generally low, however, the concentration of TCE did exceed the applicable Class I GRO, but was below the Class II GRO. PCE was detected in the soil in this area during the current and previous investigations at concentrations below the SROs.

The impacted groundwater appears to be limited to the area immediately around GP-6 (and the former MW-1) because no VOCs were detected in nearby GP-7 during the current investigation or at MW-2 or MW-3 installed during the previous investigation. Also, no VOCs were detected in an upgradient sample (GP-8), or the sample collected near former WMU-1 (GP-5).

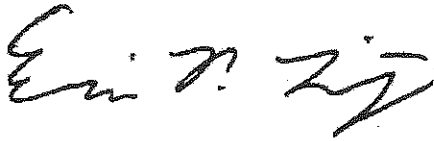
In conclusion, the soil and groundwater impacted with chlorinated solvents appears to be limited to the former area of the former WMU-2, and does not appear to be a significant impact issue based on the low groundwater concentrations and limited extent of the impact.

Mr. Mark Grimes  
March 22, 2005  
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Confidential  
Limited Phase II Site Investigation  
Selig Sealing Products, Inc., Forrest, Illinois

We appreciate the opportunity to be of service on this project. Please do not hesitate to call the undersigned at 312-541-4200, if you have any questions or require additional documentation.

Sincerely,  
GaiaTech Incorporated

A handwritten signature in black ink, appearing to read "Eric P. Leitz". The signature is fluid and cursive, with the first name "Eric" being the most prominent.

Eric P. Leitz  
Hydrogeologist

Attachments: Boring Location Map  
Boring Logs  
Analytical Results Summary of Detections Table  
Site Photographs  
Previous Phase II Report  
Laboratory Analytical Report



cc: Champaign

This Agency is authorized to require this information under Illinois Revised Statutes, 1979, Chapter 111 1/2, Section 1039. Disclosure of this information is required under that Section. Failure to do so may prevent this form from being processed and could result in your application being denied. This form has been approved by the Forms Management Center.

## ATTACHMENT 3

CERTIFICATION REGARDING POTENTIAL RELEASES FROM  
SOLID WASTE MANAGEMENT UNITS  
(CLOSURE PLAN REVIEW)

FACILITY NAME: Selig Sealing Products, Inc.EPA I.D. NUMBER: IEPA 1050455002 USEPA ILD066197195LOCATION/CITY: 342 East Wabash Forrest, IL 61741STATE: Illinois

1. Are there any of the following solid waste management units (existing or closed) at your facility? NOTE - DO NOT INCLUDE HAZARDOUS WASTES UNITS CURRENTLY SHOWN IN YOUR PART A APPLICATION AND IN YOUR CLOSURE PLAN.

	<u>YES</u>	<u>NO</u>
• Landfill	<u>      </u>	<u>X</u>
• Surface Impoundment	<u>      </u>	<u>X</u>
• Land Farm	<u>      </u>	<u>X</u>
• Waste Pile	<u>      </u>	<u>X</u>
• Incinerator	<u>      </u>	<u>X</u>
• Storage Tank (Above Ground)	<u>      </u>	<u>X</u>
• Storage Tank (Underground)	<u>      </u>	<u>X</u>
• Container Storage Area	<u>      </u>	<u>X</u>
• Injection Wells	<u>      </u>	<u>X</u>
• Wastewater Treatment Units	<u>      </u>	<u>X</u>
• Transfer Stations	<u>      </u>	<u>X</u>
• Waste Recycling Operations	<u>      </u>	<u>X</u>
• Waste Treatment, Detoxification	<u>      </u>	<u>X</u>
• Other <u>                                </u>	<u>      </u>	<u>X</u>

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2. If there are "Yes" answers to any of the items in Number 1 above, please provide a description of the wastes that were stored, treated or disposed of in each unit. In particular, please focus on whether or not the wastes would be considered as hazardous wastes or hazardous constituents under RCRA. Also include any available data on quantities or volume of wastes disposed of and the dates of disposal. Please also provide a description of each unit and include capacity, dimensions, location at facility, provide a site plan if available.

NA

NDTE: Hazardous waste are those identified in 40 CFR 261. Hazardous constituents are those listed in Appendix VIII of 40 CFR Part 261.

3. For the units noted in Number 1 above and also those hazardous waste units in your Part A application and in your closure plan, please describe for each unit any data available on any prior or current releases of hazardous wastes or constituents to the environment that may have occurred in the past or still be occurring.

Please provide the following information

- a. Date of release
- b. Type of waste released
- c. Quantity or volume of waste released
- d. Describe nature of release (i.e., spill, overflow, ruptured pipe or tank, etc.)

No Known Prior Releases

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4. In regard to the prior releases described in Number 3 above, please provide (for each unit) any analytical data that may be available which would describe the nature and extent of environmental contamination that exists as a result of such releases. Please focus on concentrations of hazardous wastes or constituents present in contaminated soil or groundwater.

NA

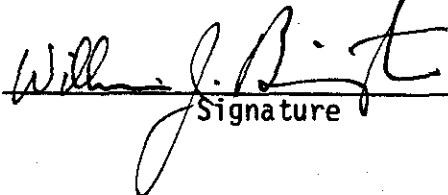
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I certify under penalty of law that this document and all attachments were prepared under my direction or supervision in accordance with a system designed to assure that qualified personnel properly gather and evaluate the information submitted. Based on my inquiry of the person or persons who manage the system, or those persons directly responsible for gathering the information, the submittal is, to the best of my knowledge and belief, true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment for knowing violations. (42 U.S.C. 6902 et seq. and 40 CFR 270.11(d))

William J. Bennington      Technical Services Manager  
Typed Name and Title

  
Signature

9 Aug 1993  
Date